

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

ALLA PASTERNAK, EXECUTRIX OF THE
ESTATE OF LEON FRENKEL,

Plaintiff,

v.

BRUCE K. KLEIN, *et al.*,

Defendants.

Civil Action

No. 14-2275-BMS

ORDER

AND NOW, this _____ day of _____, 2017, upon consideration of Plaintiff's Petition for Award of Attorneys' Fees and Costs, any response thereto, and oral argument, if any, it is hereby **ORDERED** and **DECREED** that Defendants Bruce K. Klein and Victory Partners, LLC shall pay Plaintiff \$197,170.53 for the reasonable attorneys' fees and costs associated with enforcing the VPLLC Note and VPLLC Pledge Agreement.

BY THE COURT:

Schiller, U.S.D.J.

III and IV of the Complaint related to Defendant Klein's breach of a promissory note (the "Klein Note") and pledge agreement (the "Klein Pledge Agreement").

On the morning of trial, Defendant Klein offered to settle Counts III and IV of the Complaint, which related to the Klein Note and Klein Pledge Agreement. In order to accurately and fairly calculate the total attorneys' fees and costs associated with the enforcement of the VPLLC Note and VPLLC Pledge Agreement, Plaintiff has shared the calculation of such fees and expenses on a *pro rata* basis between the VPLLC Note's principal of \$153,000.00 (86% of total principal of \$178,000.00 owed) and the Klein Note's principal of \$25,000.00 (14% of the total principal of \$178,000.00 owed). Thus, the attorneys' fees owed on the VPLLC Note (from the initiation of this action through January 8, 2017) is 86% of \$137,693.50, or \$118,416.41, and the costs for the VPLLC Note is 86% of \$3,452.71, or \$2,969.33.¹ A true and correct copy of the Client Ledger Report from April 4, 2014 through January 8, 2017 is attached hereto as Exhibit C and incorporated herein by reference.

B. Plaintiff's Enforcement of the VPLLC Note and VPLLC Pledge Agreement From Trial Through Post-Trial Submissions

The trial that took place on January 9, 2017, related solely to Counts I and II of the Complaint. Furthermore, all post-trial submissions related solely to Counts I and II of the Complaint thus, the 14% reduction (for fees and costs associated with the Klein Note and Klein Pledge Agreement) is not applicable to attorneys' fees and costs incurred after January 8, 2017. Plaintiff's total attorneys' fees from January 9, 2017 through May 5, 2017, are \$74,368.00. A true and correct copy of the Client Ledger Report from January 9, 2017 through June 2, 2017 is attached hereto as Exhibit D and incorporated herein by reference. Plaintiff's total costs from January 9,

¹ On February 29, 2016, Plaintiff filed a related fraudulent conveyance action against Defendant Klein and Ozean Partners, LLC in the Middle District of Florida (the "Florida Action"). All attorneys' fees and costs associated with the Florida Action have been subtracted from Plaintiff's total attorneys' fees and costs incurred in this action.

2017 through May 5, 2017, are \$1,416.79. *See id.* All attorneys' fees and costs attributable to the Florida Action and enforcement of the Settlement Agreement were subtracted from the total attorneys' fees and costs.

Accordingly, Plaintiff seeks an award of \$192,784.41 in fees and \$4,386.12 in costs, representing the work of Maurice R. Mitts, Esquire, Geoffrey P. Huling, Esquire, Gerard M. McCabe, Esquire, Michael J. Duffy, Esquire, Jennifer M. Adams, Esquire and Edward Millstein in enforcing the VPLLC Note and VPLLC Pledge Agreement.

II. LEGAL ARGUMENT

Pursuant to the VPLLC Note, Plaintiff is entitled to recover the reasonable costs and attorneys' fees associated with enforcing the VPLLC Note. *See Exhibit A* at ¶ 7. Plaintiff incurred significant attorneys' fees and costs associated with enforcing the VPLLC Note, which resulted in the Court entering judgment in Plaintiff's favor and against Defendants (Document No. 102). Thus, Defendants are obligated to pay Plaintiff's reasonable attorneys' fees and costs associated with enforcing the VPLLC Note.

Pursuant to the VPLLC Pledge Agreement, Plaintiff is entitled to recover the reasonable costs and attorneys' fees associated with enforcing the VPLLC Pledge Agreement. *See Exhibit B* at ¶ 5. Plaintiff incurred significant attorneys' fees and costs associated with enforcing the VPLLC Pledge Agreement, which resulted in the Court entering judgment in Plaintiff's favor and against Defendants (Document No. 102). Thus, Defendants are obligated to pay Plaintiff's reasonable attorneys' fees and costs associated with enforcing the VPLLC Pledge Agreement.

Plaintiff's attorneys' fees associated with enforcing the VPLLC Note and VPLLC Pledge Agreement included: 1) drafting the Complaint; 2) attempting to enforce the default judgments against both Defendants; 3) responding to Defendants' contention that they were never served with

the Complaint, which included: a) serving discovery on Defendants and third parties, b) preparing briefing related to the Motion to Set Aside the Default, c) traveling to Florida to depose the process server and Defendant Klein, and d) preparing and attending the evidentiary hearing.

Once the default judgments against Defendants were set aside, Plaintiff incurred additional attorneys' fees associated with enforcing the VPLLC Note and VPLLC Pledge Agreement, which included: 1) serving discovery requests on Defendants; 2) responding to Defendants' discovery requests; 3) preparing for a federal jury trial (Defendants waited until the morning of trial to waive their right to the jury trial); 4) attending the January 9, 2017 federal bench trial; and 5) preparing post-trial briefing.

Plaintiff seeks an award of \$192,784.41 in fees and \$4,386.12 in costs, representing the work of Maurice R. Mitts, Esquire, Geoffrey P. Huling, Esquire, Gerard M. McCabe, Esquire, Michael J. Duffy, Esquire, Jennifer M. Adams, Esquire and Edward Millstein in enforcing the VPLLC Note and VPLLC Pledge Agreement. Both the hourly rates and time expended in enforcing the VPLLC Note and VPLLC Pledge Agreement are reasonable. A true and correct copy of the Declaration of Maurice R. Mitts, Esquire is attached hereto as **Exhibit E**. Accordingly, Plaintiff is entitled to recover \$197,170.53 from Defendants for the costs and fees associated with enforcing the VPLLC Note and VPLLC Pledge Agreement.

III. CONCLUSION

For the foregoing reasons, Plaintiff Alla Pasternack, Executrix of the Estate of Leon Frenkel respectfully requests that the Court grant Plaintiff's Petition for Award of Attorneys' Fees and Costs and order Defendants Bruce K. Klein and Victory Partners, LLC pay Plaintiff \$197,170.53 for the reasonable attorneys' fees and costs associated with enforcing the VPLLC Note and VPLLC Pledge Agreement.

Respectfully submitted,

MITTS LAW, LLC

/s/ Maurice R. Mitts

Maurice R. Mitts, Esquire

Attorney ID No. 50297

Jennifer M. Adams, Esquire

Attorney ID No. 319377

1822 Spruce Street

Philadelphia, PA 19103

(215) 866-0112 (telephone)

(215) 866-0113 (facsimile)

Dated: August 7, 2017

*Counsel for Plaintiff Alla Pasternack,
Executrix of the Estate of Leon Frenkel*

EXHIBIT A

DEMAND PROMISSORY NOTE

\$153,000

May 7, 2010

FOR VALUE RECEIVED, VICTORY PARTNERS LLC (referred to as "Borrower") a New Jersey limited liability company with a principal place of business at 123 Elbert Street, Ramsey, NJ 07446 promises to pay to the order of LEON FRENKEL (the "Lender"), residing at 1600 Flat Rock Road, Penn Valley, PA 19072 in lawful money of the United States of America and in immediately available funds, the principal amount of One Hundred Fifty Three Thousand Dollars (\$153,000.00) (the "Borrowed Amount") together with interest accruing on the outstanding principal balance from the date hereof, as provided below.

1. **Interest and Payment.** Interest at the rate of eight percent (8%) per annum of the Borrowed Amount shall accrue from the date of this Note on the unpaid principal amount until the principal amount and all interest accrued thereon are paid. The Borrowed Amount, together with accrued and unpaid interest, shall be due and payable on Demand (the "Maturity Date"). The Borrower shall have the right to prepay the principal amount outstanding hereunder, together with accrued and unpaid interest, in whole or in part, at any time. In the event of that the Borrower does not repay the principal and unpaid interest on or before the Maturity date of this Note or any default hereunder (as provided below) whereby the entire principal and interest becomes immediately due and payable, Borrower shall pay interest calculated from the date of this note until such time as the principal and interest is repaid at the rate of fifteen percent (15%) per annum (the "Default Rate").
2. **Event of Default.** For the purposes of this Note, an "Event of Default" shall mean (i) the failure by the Borrower to make any payment due hereunder in full on or before the Maturity Date (such Event of Default being referred to as a "Monetary Default") and the receipt of written notice thereof; (ii) the appointment of a custodian, receiver, or liquidator for the Borrower or any of its property which such appointment is not discharged or dismissed within sixty (60) days (iii) the adjudication that the Borrower is insolvent; (iv) an admission by the Borrower of its inability to pay debts as they become due; (v) the Borrower shall voluntarily commence any proceeding under any Federal or state bankruptcy, insolvency, receivership or similar law; or (vi) the commencement of any proceeding under any bankruptcy law by or against the Borrower which is not dismissed within sixty (60) days. Upon the occurrence of any Event of Default, the entire principal sum outstanding, together with all accrued and unpaid interest and any and all other obligations owing under this Note, shall immediately become due and payable.
3. **Successors and Assigns.** This Note shall be binding upon the Borrower and its successors, heirs, legal representatives, and assigns, but the obligations of the Borrower under this note may not be assigned without the written consent of the Lender.

4. **Jurisdiction and Choice of Law.** The Borrower and Lender each: (a) acknowledge and agree that, in any suit, action or proceeding under this Note, the courts of the Commonwealth of Pennsylvania or the courts of the United States District Court for the Eastern District of Pennsylvania shall have the exclusive jurisdiction thereof, (b) consent to the jurisdiction of such court, and (c) consent to and waives any objection which they now has or may hereafter have to proper venue existing in any of such courts. The Note shall in all respects be governed by and construed in accordance with the laws of the Commonwealth of Pennsylvania without regard to its conflicts of law.
5. **Waiver.** Borrower waives any defense, counterclaim or setoff to any action on this Note. Presentment for payment, notice of dishonor, protest and notice of protest hereby are waived.
6. **Miscellaneous.** Any waiver by Lender of any term or provision of this Note, or any right, remedy or option under this Note, shall not be controlling, nor shall it prevent or estop Lender from thereafter enforcing such term or provision, right remedy or option, and the failure or refusal of Lender to insist in any one or more instances upon strict performance of any of the terms or provisions of this Note shall not be construed as a waiver or relinquishment for the future of any such term or provision, but the same shall continue in full force and effect; it being understood and agreed that Lender's rights, remedies and options under this Note are and shall be cumulative and are in addition to all of the rights, remedies and options of Lender at law or in equity or under any other agreement.
7. **Costs.** Borrower shall pay all costs of collection incurred by Lender, including without limitation, the reasonable attorney's fees and disbursements of Lender's legal representative, which costs may be added to the indebtedness and shall be paid promptly on demand, together with all outstanding amounts due to Lender with interest thereon at the Default Rate.
8. **Modification.** This Note cannot be changed, amended, or modified orally. This writing is intended by the parties as a final expression of this Note and also is intended as a complete and exclusive statement of the terms of this Note. No course of prior dealing between the parties, no usage of trade, and no parole or extrinsic evidence of any nature shall be used to supplement or modify any term hereof, nor are there any conditions to the full effectiveness of this Note.
9. **Maximum Interest Rate.** This Note is subject to the express condition that at no time shall the Borrower be obligated or required to pay interest on the principal balance at a rate which would subject Lender to either civil or criminal liability as a result of being in excess of the maximum rate which the Borrower is permitted by law to contract or agree to pay. If by the terms of this Note the Borrower is at any time required or obligated to pay interest on the principal balance at a rate in excess of such maximum rate, the rate of interest under this Note shall be deemed to be immediately reduced to such maximum rate and interest payable hereunder shall be computed at such maximum rate and the portion of all prior interest

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payments in excess of such maximum rate shall be applied and shall be deemed to have been payments in reduction of the principal balance.

10. Agreement in Counterparts; Facsimile Signatures. This Note may be executed in several counterparts and all so executed shall constitute one Note, binding on all parties hereto, notwithstanding that all the parties are not signatories to the original or the same counterpart. A signature transmitted by facsimile or other electronic means shall have the same effect as an original signature.

IN WITNESS WHEREOF, the Borrower has caused this Note to be duly executed and delivered to Lender on the date first written above.

VICTORY PARTNERS LLC
Borrower

LEON FRENKEL
Lender

By: 
Name: Bruce K Klein
Title: Manager

By: 
Name: Leon Frenkel
Title:

EXHIBIT B

PLEDGE AGREEMENT

Pledge Agreement dated May 7, 2010, between Victory Partners LLC, a New Jersey limited liability company ("Pledgor"), Bruce Klein, an individual ("Guarantor") and Leon Frenkel ("Holder").

1. **Grant of Security.** In order to secure payment of that certain Demand Promissory Note, dated the date hereof, in favor of Holder ("Note"), Pledgor as Borrower, each of Borrower and Guarantor (collectively, "Pledgor") hereby grants and pledges to Holder all of Pledgor's right, title and interest in and to 400,000 shares of unrestricted and freely tradable common stock of New Media Plus, Inc. and all products and proceeds of such property (the "Collateral").

2. **Delivery of Collateral.** Pledgor hereby covenants and agrees that all certificates or instruments representing or evidencing the Collateral shall be delivered to and held by or on behalf of Holder pursuant hereto.

3. **Further Assurances.** Pledgor does hereby agree that at any time and from time to time, at its expense, it will promptly execute and deliver all further instruments and documents, and take all further action, that may be necessary or desirable in order to perfect and protect any security interest granted or purported to be granted hereby or to enable Holder to exercise and enforce its rights and remedies hereunder with respect to any Collateral.

4. **Default.** In the event that Pledgor shall default in payment of the Note, Holder may declare all principal and interest on the Note immediately due and payable and shall have, in addition to any remedies provided herein or by any applicable law or in equity, all the remedies of a secured party under the UCC.

5. **Expenses.** The parties hereto agree that Pledgor will upon demand pay to Holder the amount of any and all reasonable expenses, including the reasonable fees and expenses of counsel which Holder may incur in connection with (i) the sale of, or realization upon, any of the Collateral, or (ii) the exercise or enforcement of any of the rights of Holder hereunder.

6. **Preservation of Rights.** No delay or omission on the part of Holder to exercise any right or power arising hereunder will impair any such right or power or be considered a waiver of any such right or power or any acquiescence therein. Holder's rights and remedies hereunder are cumulative and not exclusive of any other rights or remedies which Holder may have under other agreements, at law or in equity.

7. **Notices.** All notices, demands, requests, consents, approvals and other communications required or permitted hereunder must be in writing and will be effective upon receipt if delivered personally to such party, or if sent by facsimile transmission with confirmation of delivery, or by nationally recognized overnight courier service, to such address as either party may give to the other in writing.

8. **Changes in Writing.** No modification, amendment or waiver of any provision of this Agreement nor consent to any departure by Pledgor therefrom, will in any event be effective unless the same is in writing and signed by Holder, and then such waiver or consent shall be effective only in the specific instance and for the purpose for which given. No notice to or demand on Pledgor in any case will entitle Pledgor to any other or further notice or demand in the same, similar or other circumstance.

9. **Entire Agreement.** This Agreement (including the documents and instruments referred to herein)

constitutes the entire agreement and supersedes all other prior agreements and understandings, both written and oral, between the parties with respect to the subject matter hereof.

10. Continuing Security Interest. This Agreement shall create a continuing security interest in the Collateral and shall remain in full force and effect until final and indefeasible payment in full of the Note.

11. Governing law and Jurisdiction. This Agreement has been delivered to and accepted by Holder and will be deemed to be made in the State of New York.

VICTORY PARTNERS LLC

By: _____
Name:
Title:

BRUCE KLEIN

By: _____
Name:
Title:

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Victory Partner

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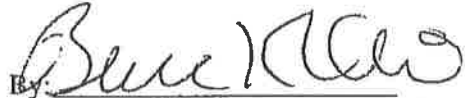
circumstance.

9. Entire Agreement. This Agreement (including the documents and instruments referred to herein) constitutes the entire agreement and supersedes all other prior agreements and understandings, both written and oral, between the parties with respect to the subject matter hereof.

10. Continuing Security Interest. This Agreement shall create a continuing security interest in the Collateral and shall remain in full force and effect until final and indefeasible payment in full of the Note.

11. Governing law and Jurisdiction. This Agreement has been delivered to and accepted by Holder and will be deemed to be made in the State of New York.

VICTORY PARTNERS LLC

By: 

Name: Bruce Klein
Title: Manager

BRUCE KLEIN

By: 

Name:
Title:

EXHIBIT C

Date: 08/03/2017

Tab3 Client Ledger Report
Mitts Law, LLC

Page: 1

Primary Timekeeper: 1 Maurice R. Mitts
Thru 01/08/2017

	Date	Ref #	Stmt #	Fee Amount	Hours	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
1098.008M Frenkel/Leonid (1)											
RE: Klein											
	04/04/2014	1	12544	797.50	2.90					797.50	797.50
	05/05/2014	2	12591	7,773.00	31.80		400.00			8,173.00	8,970.50
	06/03/2014	3	12692	892.00	4.00					892.00	9,862.50
	07/03/2014	4	12793	2,812.00	10.10		175.00			2,987.00	12,849.50
	07/29/2014	5	12920	2,289.50	16.90	2.00				2,291.50	15,141.00
	08/05/2014	6	13024	2,226.00	10.00					2,226.00	17,367.00
	09/16/2014	7	13212	1,139.00	4.00					1,139.00	18,506.00
	09/29/2014	8	13240					797.50F	12544		17,708.50
	09/29/2014	9	13240					7,773.00F	12591		9,935.50
	09/29/2014	10	13240					400.00A	12591		9,535.50
	09/29/2014	11	13240					835.50F	12692		8,700.00
	10/02/2014	12	13240	3,358.00	18.80	62.00				3,420.00	12,120.00
	10/28/2014	13	13374					56.50F	12692		12,063.50
	10/28/2014	14	13374					175.00A	12793		11,888.50
	10/28/2014	15	13374					2,395.25F	12793		9,493.25
	11/07/2014	16	13374	3,047.00	20.90	147.29	6.75			3,201.04	12,694.29
	12/09/2014	17	13469	218.50	2.30					218.50	12,912.79
	01/13/2015	18	13602	142.50	1.50	44.00				186.50	13,099.29
	03/05/2015	19	13809	2,137.50	18.40	266.44	141.75			2,545.69	15,644.98
	04/09/2015	20	13989	7,407.00	51.60	507.19	250.00			8,164.19	23,809.17
	05/04/2015	21	14060	700.00	3.20		6.75			706.75	24,515.92
	06/07/2015	22	14185	549.00	2.60					549.00	25,064.92
	07/06/2015	23	14247	218.50	2.30					218.50	25,283.42
	08/05/2015	24	14355	199.50	3.60					199.50	25,482.92
	09/03/2015	25	14474								25,482.92
	10/05/2015	26	14602								25,482.92
	11/06/2015	27	14721	385.00	1.40					385.00	25,867.92
	12/04/2015	28	14821	11,207.50	52.90	100.72	6.75			11,314.97	37,182.89
	01/06/2016	29	14907	9,119.00	42.20	143.08	64.00			9,326.08	46,508.97
	02/07/2016	30	14995	19,599.50	74.10	475.66	198.50			20,273.66	66,782.63
	03/04/2016	31	15059	9,238.00	34.40	50.89				9,288.89	76,071.52
	04/08/2016	32	15202	5,420.00	22.00	37.46				5,457.46	81,528.98
	05/09/2016	33	15288	11,441.00	42.20	19.29	6.75			11,467.04	92,996.02
	06/02/2016	34	15349	830.00	4.00	44.83	150.00			1,024.83	94,020.85
	07/06/2016	35	15477	314.00	1.60					314.00	94,334.85
	08/04/2016	36	15542	4,483.00	18.20					4,483.00	98,817.85
	09/16/2016	37	15692	1,732.50	6.30					1,732.50	100,550.35
	10/10/2016	38	15754	2,557.50	9.30					2,557.50	103,107.85
	11/08/2016	39	15840	1,402.50	5.10					1,402.50	104,510.35

Date: 08/03/2017

Tabs3 Client Ledger Report
Mitts Law, LLC

Page: 2

Primary Timekeeper: 1 Maurice R. Mitts
Thru 01/08/2017

	Date	Ref #	Stmt #	Fee Amount	Hours	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
1098.008M Frenkel/Leonid (1)			(continued)								
	12/05/2016	40	15919	4,118.50	14.70					4,118.50	108,628.85
	01/06/2017	41	16010	31,809.50	116.50	295.19	45.25			32,149.94	140,778.79
	Subtotal			149,564.00	649.80	2,196.04	1,451.50	12,432.75		153,211.54	140,778.79
Total for Primary Timekeeper 1				149,564.00	649.80	2,196.04	1,451.50	12,432.75		153,211.54	140,778.79

EXHIBIT D

Date: 08/03/2017

Tabs3 Client Ledger Report
Mitts Law, LLC

Page: 1

Primary Timekeeper: 1 Maurice R. Mitts
From 01/09/2017 Thru 06/02/2017

	Date	Ref #	Stmt #	Fee Amount	Hours	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
1098.008M Frenkel/Leonid (1)	Balance Forward:										140,778.79
RE: Klein											
	02/07/2017	42	16102	38,108.50	150.30	83.79	1,319.50			39,511.79	180,290.58
	02/07/2017	43	16102					1,200.00A	16102		179,090.58
	03/15/2017	45	16189	11,151.50	40.10		20.25			11,171.75	190,262.33
	04/12/2017	46	16306	16,857.50	61.30					16,857.50	207,119.83
	05/10/2017	47	16349	9,342.50	35.10		232.75			9,575.25	216,695.08
	06/02/2017	48	16397	13,561.50	51.70		237.05			13,798.55	230,493.63
	06/02/2017	49	16397					43.65A	16397		230,449.98
	Subtotal			89,021.50	338.50	83.79	1,809.55	1,243.65		90,914.84	230,449.98
<hr/>											
Total for Primary Timekeeper 1	Balance Forward:										140,778.79
				89,021.50	338.50	83.79	1,809.55	1,243.65		90,914.84	230,449.98

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

ALLA PASTERNAK, EXECUTRIX OF THE
ESTATE OF LEON FRENKEL,

Plaintiff,

v.

BRUCE K. KLEIN *et al.*,

Defendants.

: Civil Action

: No. 14-2275-BMS

DECLARATION OF MAURICE R. MITTS, ESQ. REGARDING ATTORNEYS' FEES

I, Maurice R. Mitts, Esq., do hereby declare as follows:

1. The facts set forth herein are based on my personal knowledge.
2. I am the Managing Member of Mitts Law, LLC, and am lead counsel in the Mitts Law firm's representation of Alla Pasternack in the case of *Alla Pasternack, Executrix of the Estate of Leon Frenkel v. Bruce K. Klein et al.*, Civil Action No. 2:14-cv-2275-BMS.
3. The following Mitts Law, LLC attorneys billed time to this case for the enforcement of the VPLLC Note and VPLLC Pledge Agreement: Maurice R. Mitts, Geoffrey P. Huling, Gerard M. McCabe, Michael J. Duffy, Jennifer M. Adams and Edward Millstein.
4. The hours expended by Mitts Law, LLC for which reimbursement is sought were reasonable and necessary for the pursuit of Plaintiff's claim against Defendants Bruce K. Klein and Victory Partners, LLC for the enforcement of the VPLLC Note and VPLLC Pledge Agreement and are fully compensable under paragraph 7 of the VPLLC Note and paragraph 5 of the VPLLC Pledge Agreement. See **Exhibit 1** (Time Records).

5. The costs incurred in enforcing the VPLLC Note and VPLLC Pledge Agreement were reasonable and necessary for the pursuit of Plaintiff's claim against Defendants, and are also fully compensable under the VPLLC Note and VPLLC Pledge Agreement. *See id.*

I declare under the penalty of perjury and subject to the penalties of 18 Pa. Cons. Stat. § 4904, relating to unsworn falsification to authorities, that the foregoing is true and correct.

August 4, 2017



Maurice R. Mitts

EXHIBIT 1

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 May 04, 2015
 Our File No: 1098-008M
 Statement No: 14060

Klein

04/02/2015	KB	Follow up re: status of service PNC Bank; Response email to A. Gary re: telephone conference with Marshal's office; Email re: Answers to Interrogatories American Momentum Bank; Review Answers to Interrogatories.	0.30	28.50
	GM	Finalize written discovery in aid of execution to be served on Klein and Victory partners	1.10	302.50
04/03/2015	GM	Finalize discovery in aid of execution for mailing to B. Klein	0.80	220.00
	KB	Revise Schedule of Writs of Execution to reflect Answers to Interrogatories by American Momentum Bank 4/2/15; Scan and upload Answers to Interrogatories American Momentum Bank to system.	0.20	19.00
04/09/2015	GM	Telephone conference with Florida counsel representing bank; exchange of email re same	0.30	82.50
	KB	Telephone from G. McCabe re: EIN number victory Partners and Social Security number Bruce Klein; Email to G. McCabe; Email from G. McCabe re: correspondence to attorney for First Bank.	0.20	19.00
04/23/2015	KB	Email from counsel for First Bank acknowledging no accounts for Bruce Klein and/or Victory Partners; Update Schedule of Writs of Execution re: First Bank.	0.30	28.50
		For Current Services Rendered	3.20	700.00
Recapitulation				
Timekeeper		Hours	Rate	Total
Gerard McCabe		2.20	\$275.00	\$605.00
Kathleen Bennett		1.00	95.00	95.00
Advances				
04/24/2015		Courier fee, delivery to USDC, Philadelphia, PA on 3/17/15.		6.75
		Total Advances		6.75

Leonid Frenkel

Klein

Page: 2

May 04, 2015

Our File No: 1098-008M
Statement No: 14060

Total Current Work	706.75
Previous Balance	\$23,809.17
Balance Due	<u>\$24,515.92</u>

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

I eonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

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 June 07, 2015
 Our File No: 1098-008M
 Statement No: 14185

Klein

05/05/2015	KB	Follow with M. Mitts re: Top Shelf stock (value); Update Schedule of Writs (Trustco Bank) re: no accounts held; Scan letter and Interrogatory Answers for Trustco Bank and upload to system.	0.30	28.50
05/06/2015	MRM	Follow up on Responses to discovery requests due from garnishees.	0.80	252.00
05/11/2015	KB	Email re: Marshal's Return of Service form for PNC Bank; Update Schedule of Writs to reflect return of service; Review system re: Response to Interrogatories from PNC; Email to G. McCabe; Telephone to PNC Bank branch manager; Email to PNC with Marshal's Return of Service; Scan U.S. Marshal Process Receipt and Return of Service and receipt to system; Letter from PNC Bank re: Answers to Interrogatories; Scan and upload to system; Email to W. Fagan, PNC, re: receipt of Answers to Interrogatories.	0.70	66.50
05/14/2015	GM	Confer with M. Mitts re Top Shelf Stock; review of emails and prepare documents for delivery to M. Mitts re delivery to J. Frankel re Top Shelf stock	0.70	192.50
05/18/2015	KB	Meeting with M. Mitts re: execution of stock and Top Shelf merging with another entity.	0.10	9.50
		For Current Services Rendered	2.60	549.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	0.80	\$315.00	\$252.00
Gerard McCabe	0.70	275.00	192.50
Kathleen Bennett	1.10	95.00	104.50

Total Current Work

549.00

Leonid Frenkel

Klein

Page: 2

June 07, 2015

Our File No: 1098-008M

Statement No: 14185

Previous Balance	\$24,515.92
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Balance Due	<u>\$25,064.92</u>
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Final Statement Run Totals 06/07/2015

Statements Printed:	1
Hours:	2.60
Fees:	549.00

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1

July 06, 2015

Our File No:

1098-008M

Statement No:

14247

Klein

06/04/2015

KB

Review Top Shelf Brands Holding's website re: transfer of assets to International Spirit and Beverage Group Inc. (ISBG); Review website for identification of transfer agent; Search ISBG's website re: acquisition of Top Shelf; Search articles re: criteria of acquisition; Telephone to V Transfer Stock to confirm transfer agent for Top Shelf; Scan articles and upload to system; Email to G. McCabe; Telephone to Michigan Department of Treasury re: procedure for obtaining information on E Title to secure assets; Email to G. McCabe.

2.30218.50

For Current Services Rendered

2.30218.50

Recapitulation

Timekeeper

Kathleen Bennett

Hours

2.30

Rate

\$95.00

Total

\$218.50

Total Current Work

218.50

Previous Balance

\$25,064.92

Balance Due

\$25,283.42

Statements Printed:	1
Hours:	2.30
Fees:	218.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, I P
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 August 05, 2015
 Our File No: 1098 008M
 Statement No: 14355

Klein

07/06/2015	KB	Conference with law clerk D. Layman re: search of Michigan Department of Treasury, unclaimed property website regarding E-Title Agency.	0.30	28.50
07/07/2015	KB	Prepare letter to US Marshal Service re: payment outstanding for service of Writ on Trustco Bank; Scan and upload US Marshal letter to the system.	0.30	28.50
07/08/2015	KB	Conference with law clerk D. Layman re: forms for Michigan unclaimed property of E-Title Agency; Review instructions for filings with D. Layman.	0.50	47.50
	PAR	Conference with K. Bennett re: unclaimed property for E-Title; conducted a property title search on E-Title Agency.	0.60	
07/09/2015	PAR	Telephone call to Michigan Deptment of Treasury re: E-Title Agency; reviewed Default Judgment; completed form for Property Reclaiming of E-Title Agency; assembled documents to support Michigan unclaimed property of E-Title Agency.	0.90	
	KB	Conference with law clerk D. Layman re: filing for unclaimed property of E-Title Agency; Review claim form; Pacer review re: Default Judgment entered against E-Title Agency; Prepare and assemble attachments to draft letter to Michigan Department of Treasury.	0.80	76.00
07/28/2015	KB	Revise letter to Michigan Department of Treasury re: unclaimed property of E-Title Agency.	0.20	19.00
		For Current Services Rendered	3.60	199.50

Recapitulation

Timekeeper	Hours	Rate	Total
Paralegal	1.50	\$0.00	\$0.00
Kathleen Bennett	2.10	95.00	199.50
Total Current Work			199.50
Previous Balance			\$25,283.42

Leonid Frenkel

Page: 2
August 05, 2015

Our File No: 1098-008M
Statement No: 14355

Klein

Balance Due

\$25,482.92

Statements Printed:	1
Hours:	3.60
Fees:	199.50

MITTS LAW, LLC
1822 Spruce Street
Philadelphia, PA 19103
Telephone: 215-866-0110
Facsimile: 215-866-0111
[REDACTED]

Leonid Frenkel
Triage Management, L.P.
401 City Avenue
Suite 528
Bala Cynwyd PA 19004

Page: 1
September 03, 2015
Our File No: 1098-008M
Statement No: 14474

Klein

Previous Balance	\$25,482.92
Balance Due	<u>\$25,482.92</u>

Statements Printed:

1

MITTS LAW, LLC
1822 Spruce Street
Philadelphia, PA 19103
Telephone: 215-866-0110
Facsimile: 215-866-0111
[REDACTED]

Leonid Frenkel
Triage Management, L.P.
401 City Avenue
Suite 528
Bala Cynwyd PA 19004

Page: 1
October 05, 2015
Our File No: 1098-008M
Statement No: 14602

Klein

Previous Balance	\$25,482.92
Balance Due	<u>\$25,482.92</u>

Statements Printed:

1

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 November 06, 2015
 Our File No: 1098-008M
 Statement No: 14721

Klein

10/30/2015

GM

Review motion to set aside default judgment; confer with M. Mitts re same;
 review and research documents in civil matter in Sarasota County as well as
 research attempts to effectuate service in NJ and in FL.

1.40 385.00

For Current Services Rendered

1.40 385.00

Recapitulation

Timekeeper
 Gerard McCabe

Hours
 1.40

Rate
 \$275.00

Total
 \$385.00

Total Current Work

385.00

Previous Balance

\$25,482.92

Balance Due

\$25,867.92

Statements Printed:	1
Hours:	1.40
Fees:	385.00

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.,
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 December 04, 2015
 Our File No: 1098-008M
 Statement No: 14821

Klein

11/02/2015			
GM	Exchange of emails with J. Frankel re Klein filing; initial review of Rule 60(b) motion; confer with M. Mitts re same; confer with K. Bennett re issues related to civil filing and criminal action in Florida.	1.10	302.50
KB	Review Hillsborough County Circuit Court docket for Victory Partners/Term Nation Holdings matter and obtain current docket; review Affidavit of Bruce Klein re: non-effective service; review New Jersey corporate website for registered agent for Victory Partners and business entity status report for business name/principal name; several calls to Hillsborough County Court re: ordering pleadings; email to clerk of Hillsborough County re: obtaining certain pleadings; telephone call from G. McCabe and review system re: Writs of Execution served on banks and bank responses; review New Jersey process for ordering business reports; email to G. McCabe re: return service for corporate documents; prepare folder for J. P. Morgan Writ of Execution documents on system.	2.80	266.00
MD	Review of motion to set aside default judgment (0.5 Hrs.).		n/c
11/03/2015			
GM	Confer with M. Mitts; review records from Sarasota police department and Florida civil action; confer with K. Bennett re same; exchange emails with J. Frankel re same.	1.20	330.00
KB	Review email from Hillsborough Circuit Court re: ordering pleadings on docket; conference with G. McCabe re same; draft letter to NJ Department of State re: corporate documents for Victory Partners; review State of NJ, Department of Treasury, Division of Revenue and Enterprise Services website re: Victory Partners, LLC; download status reports for two Victory Partners entities; telephone call from G. McCabe re: Sarasota criminal matter; review system re: police report records; review Offense Report and Supplemental Offense Report re: address noted for B. Klein; review B. Klein Affidavit re: status of claim of whereabouts prior to May, 2014; search for telephone numbers for Officer Gile and Detective McDowell and email to G. McCabe.	1.70	161.50
11/04/2015			
GM	Research and confirm response deadline as well as perform initial research regarding Response to a Motion pursuant to Rules 55(c) and 60(b)(4); review additional records and research re address of Victory Partners; confer with K. Bennett re registered agent in NJ.	0.70	192.50
11/10/2015			
GM	Confer with M. Mitts re next steps to respond to Rule 60(b) Motion	0.30	82.50

Leonid Frenkel

Our File No:

1098-008M

Statement No:

14821

Klein

11/11/2015

KB

Conference with G. McCabe re: documents from Hillsborough Circuit Court; review file re: emails to/from Hillsborough Court; prepare letter to clerk of court requesting all docketed pleadings for Victory Partners, LLL matter; email to clerk of court confirming request for pleadings; prepare Federal Express delivery and return packages to clerk of court; upload letter with emails and docket to system.

0.90

85.50

GM

Review and prepare initial draft response to Rule 60(b) motion; confer with M. Mitts re same; review emails and other documents.

2.10

577.50

11/12/2015

JA

Conducted a PeopleMap Report for Elise Klein; drafted J. Frankel's Affidavit re: his conversation with B. Klein (2.2 Hrs.).

n/c

GM

Prepare and organize documents in response to Rule 60(b) motion; confer with K. Bennett and J. Adams re same; review various records as pertaining to Mr. Klein's location during 2014.

3.10

852.50

KB

Email from G. McCabe re: execution of Klein judgment; review system re: documents prepared to enforce executions; review state of Michigan file and update actions taken re: unclaimed property for E Title Agency; conference with G. McCabe re: executions; telephone call to J P Morgan Chase re: location of accounts closed for debtors; letter to Chase to release information re: bank location; fax letter to Chase; telephone call to J. Perrell, Esquire re: location of BOA checking account held by B. Klein; telephone call to T. Chambers re: location of BOA checking account; email from T. Chambers confirming account held by B. Klein was in Sarasota, Florida; email from Federal Express confirming delivery of letter request for pleadings filed in Hillsborough Circuit Court, Florida; upload pleadings and docket to system for Rule 60(b) Motion.

4.80

456.00

MRM

Follow up on the opposition to the Rule 60(b) motion by Klein and additional supports on service and propriety of the judgment.

1.80

567.00

11/13/2015

GM

Review the Rule 60(b) Motion and revise draft affidavit of J. Frankel; review various documents and conduct research in support of Response; confer with M. Mitts and M. Duffy; exchange of emails with J. Frankel.

4.40

1,210.00

KB

Telephone call to Clerk of Hillsborough Circuit Court re: status of pleadings requested; email to G. McCabe re same; telephone call to J. P. Morgan Chase re: status of request for location of identified accounts; telephone call from G. McCabe re: contacting Sarasota Police Department re: Klein police report; telephone call to Sarasota Police Department; Several telephone calls to Hillsborough Circuit Court re: faxing pleadings requested; investigation and due diligence re: proving B. Klein received effective service at Florida address; review and revise exhibit index and cover sheet for Reply to Motion to Set Aside Default.

5.60

532.00

MD

Research regarding effective service of process on a corporation, on an owner at his personal residence, on an owner/officer when there is a registered agent on record; Dropping summon/complaint near a defendant who is attempting to evade service; Research under both PA and federal rules (4.1 Hrs.).

n/c

11/14/2015

GM

Review Rule 60(b) motion and draft Response, as well as J. Frankel Affidavit; exchange emails with M. Duffy re same; review and research case law

Leonid Frenkel

Klein

	MD	issues. Research, drafting, review and revision of memorandum asserting proper service of defendants both by leaving the service package at the door and service of a corporation on a officer or managing agent rather than registered agent under Pennsylvania, Florida and Federal law (3.1 Hrs.).	4.30	1,182.50	n/c
11/15/2015	GM	Review and revise J. Frankel affidavit; review various emails and other exhibits to be attached to Frankel Affidavit and response to Rule 60(b) motion.	4.30	1,182.50	
	MD	Research, drafting, review, revision of memorandum asserting proper service of defendants both by leaving the service package at the door and service of a corporation on a officer or managing agent rather than registered agent under Pennsylvania, Florida and Federal law (3.5 Hrs.).			n/c
11/16/2015	NK	Conducted legal research on Rule 4 federal case law regarding in-person service by a process server; incorporated Rule 4 research into sections of the Response In Opposition to the Motion to Set Aside Default Judgment; reviewed and revised final draft of the Response in Opposition (8.2 Hrs.).			n/c
	MRM	Review of the response in opposition to the motion to set aside default judgment.	0.70	220.50	
	GM	Reviewed, revised and prepared J. Frankel affidavit and response to Rule 60(b) motion; coordinated research with N. Konetski; conferred with J. Adams re Frankel Affidavit; exchange emails and telephone conversations with J. Frankel; coordinated and organized exhibits and related documents for inclusion in brief; prepare final version of response; confer with M. Mitts re same.	8.70	2,392.50	
	KB	Telephone call from G. McCabe; review system and print documents from Detective McDowell; telephone call to J. P. Morgan Chase re: status of request for bank location; email to G. McCabe re same; conference with G. McCabe re: documents from Sarasota Police Department; review emails to/from G. McCabe and M. Duffy re: service of B. Klein in New Jersey; review email from G. McCabe re: Complaint packages undeliverable in New Jersey; telephone call to Clerk of Hillsborough Circuit Court re: return of check for pleadings requested; email to L. Ray, Manager of Civil Court, re: return of check for pleadings; telephone call from G. McCabe re: registered agent for Victory Partners; Google search for The Corporate Trust Company; telephone call to G. McCabe re same; telephone call from Clerk of Hillsborough Circuit Court re: return of FedEx package and payment for pleadings; follow up calls to J. P. Morgan Chase re: status of request for bank location.	0.80	76.00	n/c
	JA	Reviewed and revised J. Frankel's Affidavit (0.4 Hrs.).			n/c
	MD	Further correspondence and meetings regarding service of process arguments in motion (0.8 Hrs.).			n/c
11/17/2015	KB	Prepare letter to Clerk, Hillsborough Circuit Court with payment for pleadings in Victory Partners matter; prepare courtesy copies (bound and with tabs) to Judge Schiller of Plaintiff's Response in Opposition to the Motion to Set Aside Default; prepare letter to Judge Schiller with courtesy copies; telephone call to Rapid Delivery.	1.20	114.00	
11/24/2015	GM	Review court's order re evidentiary hearing; exchange emails with J. Frankel			

Leonid Frenkel

Klein

Page: 4

December 04, 2015

Our File No: 1098-008M

Statement No: 14821

	KB	and confer with M. Mitts re same.	0.60	165.00
		Email from G. McCabe re: contacting process server who served B. Klein in Florida; review Affidavit of Service re: identification of process company; telephone call to B & R Services re: contact number for M. Kemper; telephone call from B & R Services re: contact information for M. Kemper; email to G. McCabe re same; telephone call to M. Kemper (left voice message).	0.50	47.50
11/25/2015	MRM	Follow up on discovery permitted by Judge Schiller and letter for G. Samms to the Court.	0.40	126.00
	KB	Telephone call to process server who served B. Klein (left voice message); telephone call from M. Kemper re: recollection of service on B. Klein on 5/16/14; email to G. McCabe re: telephone conference with M. Kemper; telephone call from G. McCabe re: photos of B. Klein property; Google search re: aerial photos and photos of Unit 303; telephone call to M. Kemper re: email address; email to M. Kemper with photos of Unit 303.	0.60	57.00
11/30/2015	JA	Reviewed Motion to Set Aside Default and Opposition to Motion to Set Aside Default in preparation for drafting discovery requests (1.1 Hrs.).		n/c
	KB	Telephone call from T. Kelly of JP Morgan Chase re: request for bank location; email to T. Kelly with original Writ, JP Morgan response and letter to Order and Levies department.	0.30	28.50
		For Current Services Rendered	52.90	11,207.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	2.90	\$315.00	\$913.50
Gerard McCabe	30.80	275.00	8,470.00
Kathleen Bennett	19.20	95.00	1,824.00

Expenses

11/13/2015	Federal Express to Hillsborough Clerk of Circuit Court, Tampa, FL re obtaining pleadings under Docket No. 14-CA-000757.	36.11
11/18/2015	Hillsborough Clerk of Circuit Court, Tampa, FL - Fee for requested pleadings.	28.00
11/19/2015	Federal Express Return to Mitts Law, LLC from the Hillsborough Clerk of Circuit Court, Tampa, FL.	36.61
	Total Expenses	100.72

Advances

11/17/2015	Courier Fee - Rapid Delivery Service - Hand Delivery to USDC, Judge Schiller.	6.75
	Total Advances	6.75
	Total Current Work	11,314.97
	Previous Balance	\$25,867.92
	Balance Due	<u>\$37,182.89</u>

Statements Printed:	1
Hours:	52.90
Fees:	11,207.50
Expenses:	100.72
Advances:	6.75

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 January 06, 2016
 Our File No: 1098-008M
 Statement No: 14907

Klein

12/02/2015	KB	Telephone call from and telephone call to JP Morgan Chase regarding request for city and state where Klein accounts were held; reviewed voice message from J. P. Morgan Chase representative; email to G. McCabe re: JP Morgan Chase requirement of a subpoena for release of city and state information.	0.40	38.00
12/03/2015	JA	Searched for B. Klein on all social media sites to determine his location when served with the complaint.	1.40	385.00
12/07/2015	KB	Conference with G. McCabe re: Subpoenas to Bank of America, JP Morgan Chase and VStock Transfer; conference with J. Adams re: Subpoenas, telephone number contact for E. Klein and search re: Divorce Decree; review system re: PeopleMap report for E. Klein and telephone number contacts; search re: Subpoena intake and processing addresses for Bank of America and JP Morgan Chase; search re: address and telephone number for VStock Transfer; telephone call to VStock Transfer to confirm address; email from/to G. McCabe re: location for VStock production of documents; email to J. Adams and G. McCabe re: addresses, etc. for Subpoenas; upload Summary Judgment Motion and Settlement Order for Victory Partners action in Florida to system; search Florida Family Court (Sarasota) re: Divorce Decree; search NJ Superior Court (Family Court) re: Divorce Decree; telephone call to NJ Superior Court regarding confirmation that Divorce Decree was filed in 2014; telephone call to Clerk, Bergen County re: copies of all public divorce records for E. Klein and B. Klein; fax to Family Court re: same; conference with J. Adams re: Subpoenas; review Federal Court forms for Subpoenas.	2.80	266.00
	GM	Confer with J. Adams and K. Bennett re subpoenas in support of evidentiary hearing; research concerning Victory Partners and its EIN; review of subpoenas as prepared by J. Adams.	1.10	302.50
	JA	Conferred with G. McCabe and K. Bennet re: the third-party subpoenas and other needed discovery; prepared subpoenas to Bank of America, JPMorgan Chase and VStock; prepared the Notice of Intent to Serve Subpoenas; prepared the cover letters to Bank of America, JPMorgan Chase and VStock; revised the subpoena packages, incorporating G. McCabe's edits; assembled the subpoena packages.	2.60	715.00
12/08/2015	GM	Confer with G. Huling re issues related to discovery in advance of evidentiary hearing; review subpoena packages; confer with J. Adams re same (1.1 Hrs.).		n/c

Leonid Frenkel

Klein

GH	Reviewed e-mail from M. Mitts re: communication with G. Samms; reviewed e-mails exchanged between M. Mitts and G. Samms; conferred with G. McCabe re: discovery issues; drafted and revised e-mail to G. Samms and forwarded to G. McCabe (0.8 Hrs.).		n/c
KB	Review system re: social security number for Bruce Klein; email to G. McCabe and J. Adams re: same.	0.20	19.00
12/09/2015			
KB	Telephone call from Family Court of Bergen County, NJ re: Divorce Decree for B. Klein; telephone call to Family Court re: same.	0.20	19.00
GM	Review and revise subpoenas to third parties in advance of hearing; confer with J. Adams re same	0.40	110.00
12/10/2015			
KB	Telephone call to Family Court, Bergen County NJ re: other public records relating to Divorce Decree for B. Klein; telephone call from Family Court re: same; telephone call from G. McCabe re: contacting process server for 1/22/16 Hearing; telephone call to M. Kemper re: hearing and telephone call from M. Kemper re: same; email to G. McCabe re: response from M. Kemper (Process Server); telephone call from Family Court re: cost for entire record of divorce proceedings; telephone call from and telephone call to Family Court re: identification of records on docket for divorce proceedings; email to G. McCabe re: Property Settlement Agreement; letter to Family Court with payment for records; prepare federal express to/from Family Court; conference with G. McCabe re: Florida property listed for rent; search re: listing agent and address.	2.50	237.50
GM	Review and finalize, with assistance of J. Adams, subpoenas to banks and stock transfer agent; confer with K. Bennett regarding divorce documents; research re condo association and real estate agent; confer with J. Adams re same.	1.60	440.00
JA	Revised and assembled subpoena packages to JPMorgan, Bank of America and VStock; conducted legal research re: the burden at the evidentiary hearing and whether the deposition of the process server will be sufficient.	3.40	935.00
12/11/2015			
KB	Email to/from Elite Litigation regarding scheduling deposition; Search re: multiple listings of the Florida property for service of subpoenas; telephone call to J. Adams re: multiple listings; email to J Adams re: current condo ownership and Property Settlement Agreement; email to G. McCabe re: multiple listings of condo; conference with J. Adams re: location for subpoena production in Florida; email to Elite Litigation Solutions re: court reporting office in Florida for production; email from Elite re: same; telephone call to J. Adams and email to FCR Court Reporters with information regarding deposition of B. Klein.	1.10	104.50
JA	Continued conducting legal research re: the burden at the evidentiary hearing and whether the deposition of the process server will be sufficient; prepared the Notice of Deposition of B. Klein and accompanying request for documents; conferred with K. Bennett re: the process server and subpoenas; prepared the subpoena package to M. Hayden and Sands Point Condominium Association; prepared cover letters to M. Hayden and the Sands Point Condominium Association; prepared the Notice of Intent to Serve subpoenas on M. Hayden and the Sands Point Condominium Association; emailed the subpoena packages and deposition notice to G. McCabe.	4.20	1,155.00

Leonid Frenkel

Klein

12/14/2015	JA	Assembled the subpoena packages to M. Hayden and the Sands Point Condominium Association.	0.60	165.00
12/15/2015	KB	Follow up re: Notice of Subpoena to condo association and My Realty Company; email to FCR Court Reporting re: Subpoena production scheduled for 1/11/16; email to J. Adams re: same; telephone call to Clerk Family Division, Bergen County, NJ re: status of documents requested; email to Clerk, Bergen County re: status of documents requested; review voice message forwarded by M. Mitts from condo association; email to G. McCabe re: same; telephone call from G. McCabe re: contacting condo association to discuss scope of the Subpoena.	0.40	38.00
	GM	Telephone conference with Gary Samms re continuation of evidentiary hearing, deposition of Mr. Klein and deposition of process server; confer with M. Mitts re same	0.30	82.50
12/16/2015	GM	Review motion to quash and other discovery, including divorce documents; confer with J. Adams and M. Mitts re same.	0.90	247.50
	KB	Receipt of documents from Superior Court of New Jersey, Family Division re: divorce proceedings for Bruce Klein; telephone call to Condo Association re: Notice of Subpoena; email to G. McCabe re: same; review documents re; confirmation of residency in Florida at the time of service; email to M. Mitts, G. McCabe and J. Adams providing divorce proceeding documents; email from FCR Court Reporting re: subpoena responses and scheduling of physical production on 1/11/16.	0.90	85.50
12/17/2015	GM	Prepare email to G. Samms re deposition of Bruce Klein; prepare email to G. Samms re issues related to continuance of hearing; confer with N. Konetski re issues related to Motion to Quash and discovery to be served on B. Klein; review of divorce documents and confer with K. Bennett re assets; exchange of emails with J. Frankel re same; review and revise Notice of Deposition of Bruce Klein, including revising documents to be produced.	2.30	632.50
	KB	Telephone call from G. McCabe re: review of divorce documents re: identification of assets of B. Klein and location for their execution; review divorce documents re: asset identification; prepare listing of assets; prepare memo detailing assets with corresponding paragraph reference and language cited in Court Order and Matrimonial Settlement Agreement; searches re: business interests identified in Settlement Agreement.	2.60	247.00
	JA	Prepared the Notice of Deposition of B. Klein to be sent to B. Klein's counsel.	0.20	55.00
12/18/2015	JA	Reviewed Interrogatories to B. Klein; conferred with G. McCabe re: same.	0.10	27.50
	GM	Review and revise discovery to be served on Bruce Klein; confer with N. Konetski re same; review other issues related to evidentiary hearing; telephone conference with divorce attorneys for E. Klein.	1.80	495.00
	KB	Follow up re: discovery served by defendants; review Requests for Admission and calculate response date; telephone call from G. McCabe re: contact information for E. Klein's divorce attorney; review court papers re: same; google search for C. Fitzgerald, Esquire re: current firm affiliation; email to G. McCabe with C. Fitzgerald, Esquire's current contact information; telephone		

Leonid Frenkel

Our File No: 1098-008M
Statement No: 14907

Klein

	call from G. McCabe re: paragraph identifications in Settlement Agreement that address investment interests.	0.60	57.00
12/28/2015			
GM	Telephone conference with G. Samms; review letter to Judge Schiller; prepare draft letter to Judge Schiller; prepare email to M. Mitts re various discovery issues regarding the evidentiary hearing; prepare lengthy email to J. Adams re responding to Motion to Quash; review various emails and history of communications that were sent to Mr. Klein at his Florida residence in support of response to Motion to Quash; prepare email to and review email from Mrs. Klein's divorce attorney; review Motion to Quash.	1.60	440.00
KB	Telephone call from G. McCabe re: contacting process server re: attendance at 1/22/16 hearing; review emails re: contact information for process server; telephone call to M. Kemper (process server) re: hearing, review Affidavit of Service and pictures of B. Klein's property; conference with A. Gary re: return dates for Subpoenas; review emails re: deposition of B. Klein on 1/6/16 and telephone call to G. McCabe re: same.	0.60	57.00
12/29/2015			
MRM	Follow up on hearing on the Defendant's Rule 60(b) motion.	0.40	126.00
12/30/2015			
JA	Reviewed the Motion to Quash in preparation for drafting the Opposition to the Motion to Quash; drafted the Motion to Quash and accompanying Proposed Order.	2.20	605.00
KB	Telephone call from G. McCabe re: confirmation of Evidentiary Hearing on 1/22/16; review Answers to Interrogatories in Attachment for the banks served with Writs of Execution re: notifications to B. Klein; review PNC Certificate of Service and google contact information for attorney-of-record; email to G. McCabe and J. Adams re: same; telephone call from G. McCabe re: contacting process server, M. Kemper; review email re: deposition of process server, M. Kemper; telephone call to M. Kemper re: deposition and hearing on 1/22/16; email to G. McCabe re: telephone conference with M. Kemper; email to M. Kemper to confirm hearing date and request dates for her deposition; review email from G. Samms re: deposition of process server.	0.80	76.00
GM	Review and revise response to Motion to Quash; respond to various issues with respect to Gary Samms and scheduling of depositions.	1.20	330.00
12/31/2015			
JA	Conferred with G. McCabe re: the Opposition to the Motion to Quash and drafting a brief; conducted legal research re: the liberal scope of discovery in federal court; reviewed and edited the Opposition to the Motion to Quash.	0.70	192.50
GM	Review and revise response to motion to quash; confer with J. Adams and K. Bennett re issues related to motion to quash, depositions, Florida Condo and other matters; research issues related to Florida Condo ownership; exchange emails with J. Frankel re same; draft, review and revise letter to G. Samms re deposition notices.	1.30	357.50
KB	Telephone call from G. McCabe re: verification that Affidavits filed on docket are the same; review Pacer and verified that Affidavits filed were duplicates; telephone call from G. McCabe re: Interrogatories in Attachment filed by bank; Obtained docket and verified that Bank of America Answers to Interrogatories were sent to B. Klein at Florida address; email from G. McCabe re: follow up regarding ownership of the Florida condo; search Sarasota real estate records re: transfer of ownership to B. Klein; review		

Leonid Frenkel

Our File No: 1098-008M
Statement No: 14907

Klein

Deed Transfer on 10/2/15 to Ozean Partners, LLC; conference with G. McCabe that Ozean Partners, LLC is owned by B. Klein.

For Current Services Rendered

0.80 76.00
42.20 9,119.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	0.40	\$315.00	\$126.00
Gerard McCabe	12.50	275.00	3,437.50
Jennifer Adams	15.40	275.00	4,235.00
Kathleen Bennett	13.90	95.00	1,320.50

Expenses

12/11/2015	Federal Express to JP Morgan Chase Bank, N.A.	18.90
12/11/2015	Federal Express to Bank of America, N.A.	18.90
12/11/2015	Federal Express to Bergen County, NJ Courthouse.	16.04
12/11/2015	Federal Express to VStock Transfer, LLC.	18.90
12/16/2015	Federal Express to Sands Point Condo Association in Florida.	26.90
12/16/2015	Federal Express to My Realty Company in Florida.	26.90
12/17/2015	Federal Express Return from Superior Court of NJ - Family Division.	16.54
	Total Expenses	143.08

Advances

12/01/2015	Online legal research - PeopleMap search for Elise Klein.	64.00
	Total Advances	64.00
	Total Current Work	9,326.08
	Previous Balance	\$37,182.89
	Balance Due	<u>\$46,508.97</u>

Statements Printed:	1
Hours:	42.20
Fees:	9,119.00
Expenses:	143.08
Advances:	64.00

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

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 February 07, 2016

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Our File No: 1098-008M
 Statement No: 14995

Klein

01/04/2016				
MRM	Follow up on next steps for building the record for the evidentiary hearing; prepare for and participate in conference call with G. Samms and G. McCabe.	0.60	189.00	
KB	Follow up re: Quit Claim Deed executed by E. Geiger (transfer of Florida condo to B. Klein); review Sarasota, FL records and obtain legible copy of Quit Claim Deed; review system re: Registration of a Foreign Judgment filed in the Middle District of Florida and email to G. McCabe re: same.	0.40	38.00	
GM	Review and revise final draft of response to motion to quash; email exchange and telephone conference with C. Fitzgerald regarding Klein's former spouse; review documents forwarded by C. Fitzgerald; prepare lengthy email to client regarding documents produced by C. Fitzgerald; prepare for and participate in conference call with M. Mitts and G. Samms.	1.10	302.50	
01/05/2016				
MRM	Call from Judge Schiller's chambers regarding the evidentiary hearing; follow up on B. Klein deposition and third-party discovery proving notice.	0.30	94.50	
GM	Exchange of lengthy emails with J. Frankel re: Florida depositions; telephone conference with G. Samms regarding scheduled Florida depositions; exchange of emails with C. Fitzgerald regarding evidentiary hearing; review of M. Kemper emails organized by K. Bennett.	0.80	220.00	
KB	Provide emails and correspondence with M. Kemper to M. Mitts and G. McCabe.	0.30	28.50	
01/06/2016				
MRM	Preparation for the depositions of M. Kemper and B. Klein; emails and telephone calls with G. Samms and L. Frenkel regarding depositions.	1.50	472.50	
GM	Review Court Order denying motion to quash; exchange of emails with C. Fitzgerald (divorce counsel to E. Geiger) regarding various divorce-related documents; exchange of emails with G. Samms re: issues related to depositions.	0.50	137.50	
01/07/2016				
JA	Reviewed B. Klein's divorce documents; prepared a timeline of all relevant events, including events relating to B. Klein's whereabouts, before and after the date of service; prepared an outline for B. Klein's deposition.	2.40	660.00	
MRM	Preparation for the depositions of M. Kemper and B. Klein.	2.50	787.50	
GM	Telephone conversation with G. Samms regarding depositions of M. Kemper and B. Klein; exchange of emails with C. Fitzgerald regarding service of divorce papers; review and revise timeline, as prepared by J. Adams.	0.70	192.50	
KB	Prepare letters requesting certified copies of Quit Claim Deed and LLC filing for Ozean Partners; identification and organization of documents for			

Leonid Frenkel

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February 07, 2016

Our File No: 1098-008M
Statement No: 14995

Klein

		depositions of M. Kemper and B. Klein.	2.50	237.50
01/08/2016				
	MRM	Preparation for and depositions of B. Klein and M. Kemper; follow up with J. Frankel regarding results of depositions and next steps.	8.00	2,520.00
	GM	Review of documents received from C. Fitzgerald; exchange of emails with C. Fitzgerald regarding Klein divorce issues; receive and review B. Klein's answer to divorce complaint; prepare email to M. Mitts and J. Frankel re: importance of B. Klein answer to divorce complaint.	0.70	192.50
	KB	Telephone call to Superior Court of NJ re: acknowledgment of service for Complaint sent to B. Klein (Florida address); prepare letter to Florida Department of State requesting certified copy of Ozean Partners LLC's filing.	0.30	28.50
01/11/2016				
	MRM	Follow up on supplemental memorandum; calls with J. Frankel on depositions; follow up on sanctions against B. Klein.	0.90	283.50
	GM	Prepare affidavit for C. Fitzgerald; draft supplemental memorandum; review Bank of America statements produced in response to subpoena; confer with J. Frankel and M. Mitts re: various issues related to evidentiary hearing.	1.60	440.00
01/12/2016				
	MRM	Preparation for evidentiary hearing on the motion to set aside default; preparation of sanctions motion and supplemental memorandum.	2.20	693.00
	JA	Reviewed the deposition transcript of M. Kemper and B. Klein in preparation for drafting the supplemental memorandum and motion for sanctions; Reviewed and revised C. Fitzgerald's Affidavit in support of the supplemental memorandum; reviewed and revised the supplemental memorandum; conducted legal research re: notice needed in advance of issuing a subpoena to a third party to attend a hearing; prepared a subpoena to C. Fitzgerald to compel her attendance at the evidentiary hearing; conducted legal research re: the methods of serving a subpoena on a third party.	1.90	522.50
	GM	Exchange of emails with J. Frankel re Bank of America documents; review deposition transcripts of M. Kemper and B. Klein.	0.80	220.00
	KB	Email to G. McCabe regarding assets identified in Klein divorce settlement; confirm transfer of judgment to USDC, Middle District of Florida; telephone call to Sarasota, FL Clerk's Office re: requests for domesticating judgment.	0.40	38.00
01/13/2016				
	GM	Review and revise draft supplemental memorandum; exchange of emails with J. Frankel re: issues related to evidentiary hearing; further review of documents produced by Bank of America.	0.90	247.50
	JA	Revised the supplemental memorandum; reviewed documents produced by Bank of America; conducted a PeopleMap search for J. Tidrow.	0.90	247.50
01/14/2016				
	GM	Review and revise supplemental memorandum; telephone conference with C. Fitzgerald re: revisions to affidavit.	0.90	247.50
	JA	Reviewed the supplemental memorandum; prepared exhibit containing Bank of America records; reviewed the requests for admission and prepared responses; began drafting motion for sanctions; incorporated a request for sanctions into the supplemental memorandum.	1.80	495.00
	KB	Telephone calls to Fredericks & Palmer (process server) and preparation of instructions to Fredericks & Palmer regarding subpoena to be served on C. Fitzgerald; telephone calls to Fredericks & Palmer re: status of service; follow		

Leonid Frenkel

Klein

up regarding certified copies of Quit Claim Deed and filing for Ozean Partners, LLC.

0.40 38.00

01/15/2016

GM

Review and revise affidavit of C. Fitzgerald; review and revise supplemental memorandum; exchange emails with J. Frankel re: depositions.

1.20 330.00

01/18/2016

MRM

Meeting with L. Frenkel regarding the evidentiary hearing to open the default judgment and settlement issues.

1.10 346.50

JA

Revised the supplemental memorandum, incorporating M. Mitts's edits; called Sands Point Condominium Association re: additional documentation re: payments received during 2014 for Unit 303; reviewed the JPMorgan Chase and Bank of America documents for any canceled checks relating to the payment of condo fees for the Florida property; revised the supplemental memorandum and accompanying exhibits to include citations to the official copy of B. Klein's deposition transcript; conducted legal research re: the ability to introduce a deposition transcript at an evidentiary hearing.

3.20 880.00

KB

Review exhibits and redact insurance policy numbers and account numbers.

0.70 66.50

MRM

Preparation for the evidentiary hearing before Judge Schiller on the Motion to Open the Default Judgment and our supplemental submission regarding same.

2.70 850.50

01/20/2016

KB

Prepare binders of supplemental memorandum and exhibits with tabs for Judge Schiller and G. Samms; prepare letter to G. Samms enclosing supplemental memorandum binder and documents received in response to subpoenas; conference with M. Mitts regarding exhibits for evidentiary hearing; prepare index of exhibits for evidentiary hearing.

1.50 142.50

JA

Final review of the supplemental memorandum, incorporating M. Mitts's revisions; prepared cover letter to Judge Schiller; conducted legal research re: the availability of unclean hands and laches when seeking to set aside an entry of default judgment; prepared a memorandum to M. Mitts re: same; reviewed B. Klein's responses to our requests for admission and interrogatories.

2.20 605.00

01/21/2016

MRM

Preparation for evidentiary hearing before Judge Schiller on the motion to open the judgment against B. Klein and Victory Partners.

6.00 1,890.00

KB

Review of B. Klein's deposition transcript for references to individuals identified in defendants' discovery responses; prepared witness files; updated index of exhibits; prepare binders of exhibits for evidentiary hearing.

4.50 427.50

JA

Conducted legal research and prepared a memo to M. Mitts re: the standards under Federal, Pennsylvania and Florida law for service of process; conducted legal research and prepared a memo to M. Mitts re: the ability to testify telephonically; conducted legal research and prepared a memo to M. Mitts re: introducing a deposition transcript at a hearing; conducted legal research re: whether equitable defenses apply to a motion to open judgment; marked relevant portions of the deposition transcripts in preparation for the evidentiary hearing; conducted research on the witnesses B. Klein proposed to call at the hearing.

3.20 880.00

GM

Prepare for the evidentiary hearing; review case law re service; review exhibits; telephone conference with G. Samms regarding issues related to evidentiary hearing; exchange of emails with J. Frankel regarding issues

Leonid Frenkel

Klein

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February 07, 2016

Our File No: 1098-008M
Statement No: 14995

		related to evidentiary hearing; telephone conference with C. Fitzgerald,	2.80	770.00
01/22/2016				
	MRM	Preparation for evidentiary hearing before Judge Schiller and Court appearance to defend against the defendants' motion to open judgment.	5.20	1,638.00
	KB	Prepare binders of complete exhibits and attendance at the evidentiary hearing.		n/c
	JA	Prepared the case law re: service for the evidentiary hearing; attendance at the evidentiary hearing.		n/c
	GM	Prepare for and attend evidentiary hearing before Judge Schiller.		n/c
01/25/2016				
	MRM	Emails with J. Frankel and G. McCabe on next steps.	0.20	63.00
	GM	Review and receive multiple messages from J. Frankel regarding Klein Motion and post-hearing brief; prepare outline of additional research and other items to accomplish prior to receipt of hearing transcript.	0.60	165.00
01/26/2016				
				n/c
	GM	Review emails from J. Frankel; prepare outline of structure of post-hearing brief.	0.60	165.00
	JA	Reviewed M. Kemper's deposition transcript to determine the appropriate designations.	0.60	165.00
				n/c
01/27/2016				
	JA	Revised and finalized list of M. Kemper deposition designations; email to G. Samms providing copy of our designations.	1.40	385.00
				n/c
	MRM	Follow up on deposition designations and exhibits for the M. Kemper deposition.	0.20	63.00
	KB	Email to M. Kemper regarding review of her deposition transcript; letter to M. Kemper enclosing deposition transcript with instructions for noting any corrections (Errata Sheet(s)) and execution of Acknowledgment of Deponent.	0.30	28.50
	GM	Review hearing transcript; respond to and review emails from J. Frankel; review and revise draft outline of post-hearing brief.	0.60	165.00
01/28/2016				
				n/c
		For Current Services Rendered	74.10	19,599.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	31.40	\$315.00	\$9,891.00
Gerard McCabe	13.80	275.00	3,795.00
Jennifer Adams	17.60	275.00	4,840.00
Kathleen Bennett	11.30	95.00	1,073.50

Expenses

01/08/2016	Bank of America - Response to Subpoena.	46.48
01/08/2016	Florida Department of State - Obtaining Certified Copy of document.	30.00

Leonid Frenkel

Klein

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February 07, 2016

Our File No: 1098-008M
Statement No: 14995

01/08/2016	Federal Express to My Realty Company, Sarasota, FL.	22.19
01/08/2016	Federal Express to JPMorgan Chase Bank, N.A.	14.36
01/08/2016	Federal Express to VStock Transfer, LLC.	14.36
01/08/2016	Federal Express to Sands Point Condominium Association, Longboat Key, FL.	22.19
01/08/2016	Federal Express to Bank of America.	14.36
01/12/2016	Federal Express to Florida Department of State.	33.90
01/14/2016	Witness Fee and Mileage - Christine Fitzgerald.	153.45
01/18/2016	Federal Express Return to Mitts Law, LLC from Florida Department of State - Certified copy of condo Quit Claim Deed.	34.40
01/19/2016	Federal Express Return to Mitts Law, LLC from Florida Department of State - Certified copy of LLC for Ozean, LLC.	33.90
01/20/2016	Hand-Delivery to The Honorable Berle M. Schiller.	6.75
01/20/2016	Hand-Delivery to Gary M. Samms, Esquire.	6.75
01/26/2016	JPMorganChase - Response to Subpoena.	42.57
	Total Expenses	475.66

Advances

01/04/2016	12/29/15 - Rapid Delivery Service - USDC - Honorable Berle M. Schiller.	6.75
01/05/2016	Rapid Delivery Service - USDC - Honorable Berle M. Schiller.	6.75
01/14/2016	Fredericks & Palmer - Service of Subpoena.	185.00
	Total Advances	198.50
	Total Current Work	20,273.66
	Previous Balance	\$46,508.97
	Balance Due	<u>\$66,782.63</u>

Final Statement Run Totals 02/07/2016

Statements Printed:	1
Hours:	74.10
Fees:	19,599.50
Expenses:	475.66
Advances:	198.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 March 04, 2016

Our File No: 1098-008M
 Statement No: 15059

Klein

02/05/2016				
	GM	Prepare and draft plaintiff's post-evidentiary hearing brief.	0.70 1.50	66.50 412.50
02/08/2016				
	GM	Review and revise plaintiff's post-evidentiary hearing brief; review of the hearing transcript and other possible exhibits.	2.30	632.50
	JA	Conducted legal research re: the conclusiveness of a process server's affidavit regarding service of process; prepared a memo detailing research.	1.90	522.50
02/09/2016				
	KB	Confer with G. McCabe regarding exhibits marked at the Evidentiary Hearing; follow up with M. Kemper regarding return of the executed Acknowledgement of Deponent to her deposition testimony given on 1/8/16.	0.30	28.50
	MRM	Follow up on plaintiff's post-evidentiary hearing brief.	2.20	693.00
	JA	Conducted legal research re: the Florida case law cited in the Motion to Set Aside Default concerning leaving papers at the door; conferred with G. McCabe re: same.	0.40	110.00
02/10/2016				
	MRM	Review of defendants' post-evidentiary hearing brief.	1.10	346.50
	KB	Download M. Kemper's 1/8/16 Deposition testimony designations.	0.50	47.50
	GM	Prepare plaintiff's post-evidentiary hearing brief; confer with M. Mitts, G. Huling and J. Adams re issues related to the post-evidentiary hearing brief; prepare and organize exhibits in support of plaintiff's post-evidentiary hearing brief.	5.70	1,567.50
	JA	Reviewed and revised plaintiff's post-evidentiary hearing brief.	1.70	467.50
02/11/2016				
	JA	Reviewed defendants' post-evidentiary hearing brief; conferred with M. Mitts re: same.	0.80	220.00
02/12/2016				
			0.20	19.00
	GM	Exchange emails with J. Frankel re issues regarding defendants' filing.	0.70	192.50
	MD	Revise fraudulent conveyance complaint.	2.50	687.50
02/18/2016				

Leonid Frenkel

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March 04, 2016

Our File No:

1098-008M

Statement No:

15059

Klein

correspondence with local counsel re same.

0.90

247.50

02/19/2016

0.40

126.00

0.40

110.00

02/22/2016

KB

Receipt of executed Acknowledgment of Deponent and Errata Sheet from M. Kemper; prepare letter to G. Samms regarding same.

0.60

57.00

GM

Prepare, draft, and revise Reply to Defendants' post-hearing brief.

1.60

440.00

02/24/2016

MRM

Review of Defendants' Reply Brief; follow up on revisions to plaintiff's Reply to defendants' post-hearing brief.

0.80

252.00

JA

Reviewed and revised Plaintiff's Reply Brief; conferred with G. McCabe re: same.

0.50

137.50

GM

Review of Defendants' Reply Brief and prepare responsive points to be raised in Plaintiff's Reply; revise Plaintiff's Reply to defendants' post-evidentiary hearing brief; confer with M. Mitts and J. Adams re various issues; review exhibits in support of Reply Brief;

5.40

1,485.00

02/25/2016

MRM

Follow up on possible letter to Judge Schiller on the defendants' misrepresentation.

0.30

94.50

GM

Reviewed Defendants' Reply; conferred with M. Duffy re service on Klein at new address; exchanged email with J. Frankel and confer with M. Mitts re same.

1.00

275.00

For Current Services Rendered

34.40

9,238.00

Recapitulation

Timekeeper

Maurice R. Mitts

Hours

4.80

Rate

\$315.00

Total

\$1,512.00

Gerard McCabe

18.20

275.00

5,005.00

Jennifer Adams

5.30

275.00

1,457.50

Michael Duffy

3.80

275.00

1,045.00

Kathleen Bennett

2.30

95.00

218.50

Expenses

02/01/2016	1/30/16 - Federal Express to Morgan Kemper (Process Server) in Sarasota, FL.	41.24
02/01/2016	1/22/15 - Taxi to USDC - Evidentiary Hearing.	9.65
	Total Expenses	50.89
	Total Current Work	9,288.89
	Previous Balance	\$66,782.63
	Balance Due	<u>\$76,071.52</u>

Final Statement Run Totals 03/04/2016

Statements Printed:	1
Hours:	34.40
Fees:	9,238.00
Expenses:	50.89

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 April 08, 2016
 Our File No: 1098-008M
 Statement No: 15202

Klein

03/01/2016		0.40	110.00
03/03/2016		0.50	137.50
03/07/2016		2.10	577.50
03/09/2016		0.90	247.50
03/10/2016		0.50	137.50
03/14/2016		0.30	82.50
03/15/2016		0.70	192.50
03/16/2016		1.30	357.50
		0.60	57.00

Leonid Frenkel

Our File No:

Statement No:

Klein

03/21/2016				
GM	Review Judge Schiller's opinion; conferred with G. Huling regarding various aspects of opinion; research regarding same.	1.20	330.00	
		0.80	220.00	
GH	Reviewed and analyzed opinion by Judge Schiller; conferred with G. McCabe; conducted legal research regarding Pennsylvania service of process rules regarding "handing" process to recipient.	1.50	412.50	
03/22/2016				
GM	Further review of Judge Schiller's opinion; research under PA law to determine whether there is other case law supporting our factual position, as regards the Court's legal reasoning.	1.70	467.50	
MD	Phone call and correspondence with J. Kerr regarding case status and next steps.	0.30	82.50	
JA	Reviewed Judge Schiller's opinion.	0.50	137.50	
03/23/2016				
GM	Perform additional research re service pursuant to PA law and specifically the "by handing" requirement.	1.40	385.00	
03/28/2016				
		0.30	82.50	
03/29/2016				
KB	Conference with G. McCabe re: pleadings with Certificates of Service to B. Klein (in support of Motion for Reconsideration); review docket entries; conference with G. McCabe re: JP Morgan Chase and Bank of America records (June, July and August 2014); review of JP Morgan Chase and Bank of America records for June, July and August 2014; conference with G. McCabe re: same.	2.90	275.50	
GM	Review pleadings and factual certificates regarding delivery of documents to B. Klein's Sands Point address; confer with M. Mitts and K. Bennett regarding same; prepare email to M. Mitts regarding same.	1.40	385.00	
03/31/2016				
JA	Conducted legal research re: the validity of service under PA law when a complaint is left in the vicinity of the person in control of the property; conducted legal research re: whether the certificate of service is evidence of receipt of a document.	2.70	742.50	
	For Current Services Rendered	22.00	5,420.00	

Recapitulation

Timekeeper	Hours	Rate	Total
Gerard McCabe	6.90	\$275.00	\$1,897.50
Michael Duffy	6.90	275.00	1,897.50
Kathleen Bennett	3.50	95.00	332.50
Geoffrey Huling	1.50	275.00	412.50
Jennifer Adams	3.20	275.00	880.00

Leonid Frenkel

Our File No:

Statement No:

Klein

Expenses

02/23/2016	Federal Express to Morgan Kemper.	<u>37.46</u>
	Total Expenses	<u>37.46</u>
	Total Current Work	5,457.46
	Previous Balance	\$76,071.52
	Balance Due	<u>\$81,528.98</u>

Final Statement Run Totals 04/08/2016

Statements Printed:	1
Hours:	22.00
Fees:	5,420.00
Expenses:	37.46

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 May 09, 2016
 Our File No: 1098-008M
 Statement No: 15288

Klein

04/01/2016				
	JA	Drafted memorandum to G. McCabe summarizing the presumption of delivery granted to certificates of service; conferred with M. Mitts re: Florida's "resident" requirement and whether relief under 60(b) is an equitable proceeding.	0.20	55.00
	MRM	Conferred with J. Adams re: Florida's "resident" requirement and whether relief under 60(b) is an equitable proceeding; follow up with Florida counsel on the fraudulent transfer claims.	1.50	412.50
			0.30	94.50
04/03/2016				
	GM	Review, draft and revise Motion for Reconsideration; prepare email to J. Adams regarding same.	3.10	852.50
04/04/2016				
	JA	Reviewed and revised the Motion for Reconsideration and supporting Memorandum of Law; assembled the exhibits.	3.60	990.00
	GM	Review, revise and finalize Motion for Reconsideration.	2.80	770.00
			0.40	110.00
04/05/2016				
	KB	Assemble two bound copies, with exhibits, of Plaintiff's Motion for Reconsideration; prepare draft letter to Judge Schiller.	0.70	66.50
04/08/2016				
			0.50	137.50
04/11/2016				
			0.40	110.00
04/12/2016				
			0.40	110.00
04/14/2016				
			0.60	189.00

Leonid Frenkel

Our File No:
Statement No:

Klein

		3.90	1,072.50
04/15/2016			
		1.70	467.50
		2.40	660.00
JA	Draft and revise letter to G. Samms, enclosing copy of the Complaint.	0.50	137.50
04/18/2016			
		5.10	1,402.50
04/19/2016			
		2.10	577.50
04/21/2016			
JA	Review of opposition to motion for reconsideration; reviewed case law cited in opposition memorandum.	1.20	330.00
		0.50	137.50
	phone calls with M. Duffy and J. Kerr regarding filing of response to motion to intervene; exchange emails with M. Duffy re: issues related to motion to amend.	2.90	797.50
		1.20	330.00
04/22/2016			
		0.10	27.50
		0.80	220.00
		0.90	247.50
04/25/2016			
MRM	Follow up with B. Klein's former girl friend on issues related to service and B. Klein's fraudulent transfers; calls with L. Frenkel and J. Frankel regarding same.	1.30	409.50
GM	Participate in telephone call with M. Mitts regarding conversation with K. McKieveir (B. Klein's former girl friend); telephone call with K. McKieveir.	0.90	247.50
04/26/2016			
		0.70	192.50
04/27/2016			
		0.70	66.50

Leonid Frenkel

Page: 3

May 09, 2016

Our File No:

1098-008M

Statement No:

15288

Klein

	0.80	220.00
For Current Services Rendered	42.20	11,441.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	2.20	\$315.00	\$693.00
Gerard McCabe	13.70	275.00	3,767.50
Michael Duffy	17.50	275.00	4,812.50
Kathleen Bennett	1.40	95.00	133.00
Jennifer Adams	7.40	275.00	2,035.00

Expenses

04/15/2016	Federal Express to Gary M. Samms, Esquire enclosing Complaint and Summons.	19.29
	Total Expenses	19.29

Advances

04/06/2016	Hand-Delivery to the Honorable Berle M. Schiller - courtesy copies of Plaintiff's Motion for Reconsideration.	6.75
	Total Advances	6.75
	Total Current Work	11,467.04
	Previous Balance	\$81,528.98
	Balance Due	<u>\$92,996.02</u>

Statements Printed:	1
Hours:	42.20
Fees:	11,441.00
Expenses:	19.29
Advances:	6.75

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 June 02, 2016
 Our File No: 1098-008M
 Statement No: 15349

Klein

05/04/2016		0.20	19.00
05/05/2016			
		0.70	66.50
		0.50	137.50
05/06/2016			
		0.60	57.00
05/09/2016			
		0.70	192.50
		1.00	275.00
05/17/2016			
JA	Reviewed Judge Schiller's policies and procedures; emailed M. Mitts and G. McCabe listing the next steps.	0.30	82.50
	For Current Services Rendered	4.00	830.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Gerard McCabe	0.70	\$275.00	\$192.50
Michael Duffy	1.50	275.00	412.50
Kathleen Bennett	1.50	95.00	142.50
Jennifer Adams	0.30	275.00	82.50

Expenses

05/02/2016	22.36
05/11/2016	22.47

Leonid Frenkel

Page: 2

June 02, 2016

Our File No:

1098-008M

Statement No:

15349

Klein

Total Expenses

44.83Advances

05/05/2016

Total Advances

150.00

150.00

Total Current Work

1,024.83

Previous Balance

\$92,996.02

Balance Due

\$94,020.85

Final Statement Run Totals 06/02/2016

Statements Printed:	1
Hours:	4.00
Fees:	830.00
Expenses:	44.83
Advances:	150.00

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 July 06, 2016
 Our File No: 1098-008M
 Statement No: 15477

Klein

06/01/2016

0.40 66.50
 110.00

06/06/2016

0.10 27.50

06/08/2016

0.40 110.00
 1.60 314.00

For Current Services Rendered

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Michael Duffy	0.90	\$275.00	\$247.50
Kathleen Bennett	0.70	95.00	66.50

Total Current Work 314.00

Previous Balance \$94,020.85

Balance Due \$94,334.85

Final Statement Run Totals 07/06/2016

Statements Printed:	1
Hours:	1.60
Fees:	314.00

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Page: 1
 August 04, 2016

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Our File No: 1098-008M
 Statement No: 15542

Klein

07/06/2016

MRM	Preparation for the Rule 16 Conference before Judge Schiller - Rule 16 Information Report, Initial Disclosures and Joint Discovery Plan; prepare Plaintiff's Second Set of Request for Production of Documents.	3.20	1,008.00
JA	Conferred with M. Mitts re: the Rule 16 Conference; prepared the Rule 16 Information Report for the Conference; drafted the Initial Disclosures; assembled the related document production; drafted the Joint Discovery Plan; email correspondence with A. Basilevsky re: the Joint Discovery Plan; revised the Joint Discovery Plan, incorporating A. Basilevsky's comments; drafted Plaintiff's Second Set of Request for Production of Documents; reviewed Defendants' Initial Disclosures.	5.90	1,622.50
GM	Reviewed and revised the Joint Discovery Plan, Initial Disclosures and discovery requests; conferred with J. Adams and M. Mitts re: same.	1.40	385.00
KB	Assemble and create pleadings binders in preparation for Rule 16 Conference.	4.10	389.50

07/07/2016

KB	Follow up regarding calendaring of dates/deadlines listed in 7/7/16 Scheduling Order.	0.20	19.00
MRM	Preparation for and attendance at Rule 16 Conference before Judge Schiller.	2.40	756.00

07/10/2016

MRM	Telephone calls with L. Frenkel on the Rule 16 Conference with Judge Schiller and next steps.	0.30	94.50
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07/25/2016

MRM	Follow up on supplemental document requests and Requests for Admission.	0.40	126.00
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07/27/2016

		0.30	82.50
For Current Services Rendered		18.20	4,483.00

Recapitulation

Timekeeper	Hours	Rate	Total
Maurice R. Mitts	6.30	\$315.00	\$1,984.50
Gerard McCabe	1.40	275.00	385.00
Michael Duffy	0.30	275.00	82.50
Kathleen Bennett	4.30	95.00	408.50
Jennifer Adams	5.90	275.00	1,622.50


Leonid Frenkel

Our File No: 1098-008M
Statement No: 15542

Klein

Total Current Work	4,483.00
Previous Balance	\$94,334.85
Balance Due	<u>\$98,817.85</u>

Statements Printed:	1
Hours:	18.20
Fees:	4,483.00

1822 Spruce Street
Philadelphia, PA 19103
Telephone: 215-866-0110
Facsimile: 215-866-0111


Leonid Frenkel
Triage Management, L.P.
401 City Avenue
Suite 528
Bala Cynwyd PA 19004

Page: 1
September 16, 2016
Our File No: 1098-008M
Statement No: 15692

Klein

08/18/2016	JA	Drafted responses and objections to Defendants' Request for production of documents.	1.40	385.00
08/19/2016	JA	Reviewed Defendants' Second Set of Request for production of documents; email correspondence with J. Frankel and L. Frenkel re: the Second Set of Request for production of documents; reviewed Defendants' Objections and Responses to our Second Set of Request for production of documents; emailed copy to L. Frenkel and J. Frankel.	2.10	577.50
08/29/2016	JA	Reviewed email correspondence, upcoming deadlines and outstanding discovery.	0.30	82.50
08/31/2016	JA	Email correspondence with J. Frankel re: responding to Defendants' discovery requests and Defendants' discovery production; reviewed documents produced by defendants; prepared responses to Defendants' Second Request for production of documents.	1.70	467.50
	GM	Review of discovery responses and requests; email exchanges with J. Frankel re: discovery.	0.80	220.00
		For Current Services Rendered	6.30	1,732.50

Recapitulation

Timekeeper	Hours	Rate	Total
Gerard McCabe	0.80	\$275.00	\$220.00
Jennifer Adams	5.50	275.00	1,512.50

Total Current Work	1,732.50
Previous Balance	\$98,817.85
Balance Due	<u>\$100,550.35</u>

Statements Printed:	1
Hours:	6.30
Fees:	1,732.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 October 10, 2016

Our File No: 1098-008M
 Statement No: 15754

Klein

09/06/2016	JA	Reviewed documents in preparation for production.	0.70	192.50
09/16/2016	GM	Respond to emails from defense counsel re: discovery; review of discovery objections and responses; review of documents to be produced.	1.90	522.50
	JA	Prepared for the deposition of B. Pojunis; reviewed the Affidavit of J. Frankal and B. Klein; reviewed the motion to set aside; prepared a deposition outline for M. Mitts.	5.00	1,375.00
09/19/2016	JA	Review of plaintiff's response to second set of request for production of documents; email correspondence with defense counsel, attaching document production.	0.60	165.00
09/26/2016	JA	Review of previously produced emails in advance of the meet and confer; conferred with G. McCabe re: same.	0.50	137.50
09/27/2016	JA	Email correspondence with A. Basilevsky re: rescheduling of the meet and confer.	0.20	55.00
09/30/2016	JA	Meet and confer with A. Basilevsky re: claims of attorney client privilege.	0.40	110.00
		For Current Services Rendered	9.30	2,557.50

Recapitulation

Timekeeper	Hours	Rate	Total
Gerard McCabe	1.90	\$275.00	\$522.50
Jennifer Adams	7.40	275.00	2,035.00

Total Current Work	2,557.50
Previous Balance	\$100,550.35
Balance Due	<u>\$103,107.85</u>

Statements Printed:	1
Hours:	9.30
Fees:	2,557.50

MMTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 November 08, 2016
 Our File No: 1098-008M
 Statement No: 15840

Klein

10/05/2016				
GM	Prepare requests for admissions; conferred with J. Adams re: same.	2.10		577.50
10/06/2016				
GM	Conferred with J. Adams re: requests for admissions; review finalized requests for admissions.	1.10		302.50
JA	Reviewed and revised the requests for admissions; conferred with G. McCabe re: same.	1.10		302.50
10/24/2016				
JA	Conferred with G. McCabe re: deposing B. Pojunis; conducted a search for recent information on B. Pojunis.	0.60		165.00
10/28/2016				
		0.20		55.00
	For Current Services Rendered	5.10		1,402.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Gerard McCabe	3.20	\$275.00	\$880.00
Michael Duffy	0.20	275.00	55.00
Jennifer Adams	1.70	275.00	467.50

Total Current Work	1,402.50
Previous Balance	\$103,107.85
Balance Due	<u>\$104,510.35</u>

Final Statement Run Totals 11/08/2016

Statements Printed:	1
Hours:	5.10
Fees:	1,402.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Page: 1

December 05, 2016

Our File No: 1098-008M
 Statement No: 15919

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Klein

Date	Initials	Description	Hours	Amount
11/01/2016	JA	Reviewed discovery requests and document production received; prepared a list of deficiencies.	2.40	660.00
11/02/2016	MRM	Follow up regarding the notices of deposition for L. Frenkel and J. Frankel and objections to same.	0.70	220.50
	JA	Conducted legal research re: notice requirement for depositions; conferred with G. McCabe re: same; emailed a summary of research to M. Mitts.	2.50	687.50
11/04/2016	MRM	Follow up with defense counsel, J. Frankel and L. Frenkel over the requested extension of the discovery deadline and the last minute effort to depose J. Frankel and L. Frenkel.	0.40 0.10	126.00 27.50
11/07/2016	MRM	Follow up on opposition to the motion to extend discovery deadline.	0.40	126.00
	JA	Reviewed motion to extend discovery deadline; conferred with M. Mitts re: same.	0.90	247.50
11/08/2016	MRM	Follow up on the opposition to Klein's motion to extend discovery deadline.	0.40	126.00
	JA	Reviewed responses to requests for admission.	0.70	192.50
11/09/2016	GM	Reviewed responses to requests for admission; conferred with J. Adams re: same; exchange of emails to/from J. Frankel re: same.	1.30	357.50
11/10/2016	JA	Reviewed Scheduling Order; prepared email to M. Mitts and G. McCabe with upcoming deadlines.	0.40	110.00
11/14/2016			0.20	55.00
11/15/2016	JA	Conferred with M. Mitts re: preparing summary judgment motion.	0.40	110.00
11/28/2016	JA	Reviewed defendants' motion for summary judgment.	1.00	275.00

Leonid Frenkel

December 05, 2016

Our File No: 1098-008M
Statement No: 15919

Klein

11/30/2016				
JA	Began preparing the opposition to defendants' motion for summary judgment.	2.90		797.50
	For Current Services Rendered	14.70		4,118.50

Recapitulation

Timekeeper	Hours	Rate	Total
Maurice R. Mitts	1.90	\$315.00	\$598.50
Gerard McCabe	1.30	275.00	357.50
Michael Duffy	0.30	275.00	82.50
Jennifer Adams	11.20	275.00	3,080.00

Total Current Work	4,118.50
Previous Balance	\$104,510.35
Balance Due	<u>\$108,628.85</u>

Statements Printed:	1
Hours:	14.70
Fees:	4,118.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 January 06, 2017

Our File No: 1098-008M
 Statement No: 16010

Klein

Date	Initials	Description	Hours	Amount
12/01/2016	JA	Conducted legal research re: trial deposition subpoenas; prepared memorandum re: same.	4.00	1,100.00
12/02/2016	MRM	Follow up on the response in opposition to defendants' motion for partial summary judgment	1.10	346.50
	GM	Reviewed and revised the response in opposition to defendants' motion for partial summary judgment; conferred with J. Adams re: same.	2.30	632.50
	JA	Began drafting the opposition package to defendants' motion for partial summary judgment; conducted legal research re: contract interpretation; conferred with G. McCabe re: same.	7.80	2,145.00
12/03/2016	GM	Reviewed and revised the response in opposition to defendants' motion for partial summary judgment; research re: same.	2.30	632.50
12/04/2016	GM	Reviewed and revised the response in opposition to defendants' motion for partial summary judgment.	2.70	742.50
12/05/2016	MRM	Follow up on the response in opposition to defendants' motion for partial summary judgment	0.80	252.00
	GM	Conference call with J. Frankel and J. Adams re: draft response; reviewed and revised draft response; prepared Leon Frenkel's affidavit; conferred with M. Mitts and J. Adams re: issues related to draft response; finalized draft response and exhibits for filing.	6.10	1,677.50
	JA	Conferred with G. McCabe re: opposition to the motion for partial summary judgment; reviewed J. Frankel's comments to the opposition; prepared answer to defendants' material facts; conference call with J. Frankel and G. McCabe to discuss revisions to the opposition; prepared exhibit index and exhibit cover sheets; assembled exhibits; prepared certificate of service; reviewed and revised the opposition; reviewed and revised L. Frenkel's Affidavit.	7.10	1,952.50
12/08/2016	JA	Reviewed filings to ensure all exhibits have been properly redacted.	1.20	330.00
12/09/2016	JA	Conducted legal research re: trial depositions.	1.90	522.50

Leonid Frenkel

Klein

KB	Prepared letter to Judge Schiller enclosing courtesy copy of plaintiff's opposition to defendants' motion for partial summary judgment.	0.40	38.00
12/11/2016			
MRM	Follow up on motion for protective order and to quash untimely deposition.	0.60	189.00
GM	Prepared draft email, for review by J. Adams, re: deposition of Pojunis.	0.90	247.50
12/12/2016			
JA	Reviewed and revised email to opposing counsel re: deposition; began drafting motion to quash and for protective order.	2.10	577.50
MRM	Emails with defendants' counsel regarding trial deposition.	0.80	252.00
KB	Assembled courtesy copy of opposition to defendants' motion for partial summary judgment; revised letter to Judge Schiller enclosing courtesy copy.	0.80	76.00
12/13/2016			
MRM	Letter to Judge Schiller regarding trial deposition of Pulonis and hearing before Judge Schiller regarding same; follow up on opposition to summary judgment, Judge Schiller's order under 56(f) and preparation of submission to the Court regarding same.	2.70	850.50
GM	Prepared for conference call with Judge Schiller; reviewed court's opinion.	2.30	632.50
KB	Obtained and reviewed updated docket; updated pleadings binders.	1.10	104.50
JA	Continued drafting motion for protective order; drafted letter to Judge Schiller re: deposition trial subpoena.	6.00	1,650.00
12/14/2016			
JA	Reviewed defendants' responses to plaintiff's requests for admissions; assembled binders in preparation for trial.	2.30	632.50
12/15/2016			
JA	Reviewed pleadings, discovery requests and responses and document productions in preparation for trial; conferred with M. Mitts re: strategy; began preparing motion in limine; reviewed and revised 56(f) submission.	8.50	2,337.50
12/16/2016			
MRM	Trial preparation re: rule 56(f) submission, joint pretrial submissions, jury interrogatories, points for charge and motion in limine.	2.70	850.50
12/18/2016			
GM	Reviewed and revised motion in limine; exchanged emails with J. Adams and M. Mitts re: same.	1.10	302.50
JA	Continued preparing the motion in limine; prepared exhibit index and exhibit cover sheets; assembled the exhibits.	2.20	605.00
12/19/2016			
MRM	Follow up on finalizing the motion in limine regarding counts two and three.	0.80	252.00
JA	Revised the motion in limine package; prepared the trial exhibit list; drafted the joint trial stipulation; prepared the proposed jury verdict sheets; conferred with G. McCabe re: same.	9.00	2,475.00
GM	Reviewed Best Evidence Rule re: motion in limine research; conferred with J. Adams and M. Mitts re: same; exchanged emails with E. Millstein re: additional issues re: voir dire and jury instructions; conferred with J. Adams re: same.	2.80	770.00
EM	Reviewed file; research re: voir dire; reviewed local rules and J. Schiller's procedures.	1.40	385.00

January 06, 2017

Leonid Frenkel

Our File No:
Statement No:1098-008M
16010

Klein

MD	Correspondence with G. McCabe re: voir dire instructions and jury materials; review of file re: same.	0.30	82.50
12/20/2016			
MRM	Revisions to the Rule 56(f) submission to expand the count I relief to include Bruce Klein personally.	2.40	756.00
GM	Review of the pretrial statement and exchanged emails with A. Basilevsky re: same; conferred with J. Adams re various filings; reviewed and revised voir dire; reviewed and revised exhibit list; reviewed and revised response to Rule 56(f) notice; conferred with M. Mitts re: revisions to Rule 56(f) notice.	3.90	1,072.50
JA	Reviewed and revised Rule 56(f) response incorporating M. Mitts's comments; prepared exhibit index and assembled exhibits; finished drafting proposed jury verdict sheet; reviewed and revised proposed voir dire questions.	2.90	797.50
EM	Drafted voir dire; research re: points for charge.	2.70	742.50
KB	Assembled courtesy copies of plaintiff's motion in limine for delivery to Judge Schiller; prepared letter to Judge Schiller.	0.60	57.00
12/21/2016			
MRM	Follow up on 56(f) supplemental submission.	0.60	189.00
GM	Prepared trial-related submissions; conferred with E. Millstein re: jury instructions; reviewed and revised Rule 56(f) submission; conferred with M. Mitts re: same.	1.40	385.00
KB	Follow up re: revised filing and telephone call to the clerk's office re: substituted filing.	0.20	19.00
EM	Research re: points for charge; reviewed Third Circuit model jury instructions.	1.60	440.00
12/22/2016			
JA	Reviewed defendants' voir dire; revised proposed jury verdict sheet; researched case law re: oral agreements; conferred with G. McCabe re: same.	1.60	440.00
GM	Reviewed and revised pretrial submissions; exchanged emails with A. Basilevsky; telephone call with A. Basilevsky; telephone call with J. Frankel re: same.	5.10	1,402.50
MD	Review of court's memorandum re: motion to dismiss.	0.40	110.00
12/23/2016			
GM	Exchanged emails with J. Frankel; reviewed and revised pretrial stipulation; prepared email to A. Basilevsky.	0.80	220.00
12/25/2016			
MRM	Preparation for trial.	2.20	693.00
12/27/2016			
MRM	Preparation for telephonic hearing before Judge Schiller on piercing of the corporate veil and alter ego theories.	1.80	567.00
KB	Follow up with M. Mitts re: upcoming trial; reviewed system and downloaded discovery responses, production by B. Klein and scheduling order; searched Florida Bureau of Corporations re: status of Victory Partners, LLC; telephone call to Florida Bureau of Corporations re: Certificate of Status.	1.30	123.50
12/29/2016			
MRM	Follow up on settlement authority.	0.30	94.50
KB	Prepared letter to the Florida Department of State re: obtaining a certified		

Leonid Frenkel

Our File No: 1098-008M

Statement No: 16010

Klein

copy of a Certificate of Status for Victory Partners, LLC.	0.60	57.00
For Current Services Rendered	116.50	31,809.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	16.80	\$315.00	\$5,292.00
Edward Millstein	5.70	275.00	1,567.50
Gerard McCabe	31.70	275.00	8,717.50
Michael Duffy	0.70	275.00	192.50
Kathleen Bennett	5.00	95.00	475.00
Jennifer Adams	56.60	275.00	15,565.00

Expenses

12/05/2016	Taxi for G. McCabe (filing of Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment).	31.19
01/06/2017	Treasurer, State of New Jersey, certified copy of Long Form Standing Report for Victory Partners, LLC	264.00
	Total Expenses	295.19

Advances

12/12/2016	Hand Delivery to the Honorable Berle M. Schiller, courtesy copy of Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment.	6.75
12/20/2016	Hand Delivery to the Honorable Berle M. Schiller, Plaintiff's Motion in Limine.	6.75
12/22/2016	Hand Deliveries to the Honorable Berle M. Schiller, Joint Pretrial Stipulation, Plaintiff's proposed Verdict Form and Points for Charge.	26.75
12/29/2016	FL Department of State - Certified Certificate of Status for Victory Partners, LLC.	5.00
	Total Advances	45.25
	Total Current Work	32,149.94
	Previous Balance	\$108,628.85
	Balance Due	<u>\$140,778.79</u>

Statements Printed:	1
Hours:	116.50
Fees:	31,809.50
Expenses:	295.19
Advances:	45.25

1822 Spruce Street
Philadelphia, PA 19103
Telephone: 215-866-0110
Facsimile: 215-866-0111
[REDACTED]

Page: 1
February 07, 2017

Our File No: 1098-008M
Statement No: 16102

Leonid Frenkel
Triage Management, L.P.
401 City Avenue
Suite 528
Bala Cynwyd PA 19004

Klein

01/02/2017	MRM	Preparation for the bench trial on piercing the corporate veil and alter ego regarding Victory Partners, LLC; follow up on settlement discussions with opposing counsel.	1.80	567.00
01/03/2017	GM	Conferred with J. Adams re: issues related to jury trial; conferred with E. Millstein re: piercing the corporate veil.	1.10	302.50
	KB	Telephone call to Florida Division of Corporations re: status of certified copy of Certificate of Status; follow up with J. Adams re: certified copy.	0.30	28.50
	EM	Conferred with G. McCabe and J. Adams; reviewed pleadings, transcripts and document productions re: piercing the corporate veil; research re: same.	7.20	1,980.00
	JA	Conferred with G. McCabe and E. Millstein re: trial strategy; conducted legal research re: piercing the corporate veil; revised the exhibit list; reviewed the defendants' bank documents.	7.00	1,925.00
01/04/2017	MRM	Follow up with Mrs. Klein's divorce counsel regarding destruction of corporate records of Victory Partners; follow up on certifications from the Secretary of State of Florida; revisions to final pretrial submissions, jury instructions, verdict slip and statement of disputed and undisputed facts and related legal supports.	1.80	567.00
	GM	Prepared and reviewed amended stipulation; exchanged emails with Alex Basilevsky re: same; conferred with J. Adams re: same.	1.30	357.50
	KB	Follow up and telephone call to Florida Division of Corporations re: status of certified Certificate of Status; follow up with M. Mitts re: same; follow up re: Victory Partners, LLC entity status (designated as an inactive entity); follow up re: NJ corporate filings for Victory Partners, LLC; follow up re: PA corporate search for Victory Partners, LLC; follow up with J. Adams re: same.	0.70	66.50
	EM	Reviewed and analyzed cases on corporate veil cited by Judge Schiller; research re: same; reviewed and supplemented exhibit list for trial; analyzed and summarized bank statements.	5.80	1,595.00
	JA	Conducted legal research re: VPLLC's administrative dissolution and the impact on piercing the corporate veil; revised the joint pretrial memorandum; conferred with G. McCabe re: same.	5.60	1,540.00
01/05/2017	EM	Reviewed Klein divorce motion re non-production of documents; met with M. Mitts and J. Adams; cross referenced statements in conference information statement, interrogatory responses and document request responses; develop argument on piercing the corporate veil.	5.00	1,375.00

February 07, 2017

Leonid Frenkel

Our File No: 1098-008M
Statement No: 16102

Klein

MRM	Preparation for trial; conference calls with L. Frenkel and J. Frankel.	2.80	882.00
JA	Prepared an exhibit binder of defendants' exhibits for M. Mitts's review; reviewed our exhibits; updated the exhibit list; prepared an exhibit binder of our exhibits; conferred with M. Mitts and E. Millstein re: piercing the corporate veil; reviewed and revised the jury verdict sheet.	8.70	2,392.50
GM	Prepared for trial with M. Mitts and J. Adams; prepared and exchanged emails with A. Basilevsky re: amended pretrial stipulation.	0.80	220.00
KB	Searched Pacer re: PA and NJ actions against B. Klein and/or Victory Partners, LLC; Searched NJ Superior Court (Bergen County) and Hillsboro Circuit Court of FL re: actions against B. Klein and/or Victory Partners, LLC; follow up re: trial exhibits; follow up re: certified copy of Certificate of Status; uploaded same to system; follow up with J. Adams re: certified copy of status report of Victory Partners, LLC (NJ); reviewed New Jersey guidelines for Apostiles and Notary Certifications; telephone call to NJ Department of Revenue and Enterprise Services to confirm procedures for over-the-counter certifications; telephone call to Fredericks and Palmer re: securing certified copy of Certificate of Status for Victory Partners, LLC (NJ); follow up with J. Adams re: trial exhibit binders.	3.20	304.00
01/06/2017			
MRM	Preparation for trial; calls with G. Samms and follow up regarding settlement; follow up with J. Frankel regarding trial preparation; follow up on piercing the corporate veil evidence.	3.30	1,039.50
JA	Reviewed divorce documents; conferred with C. Fitzgerald re: obtaining B. Klein's case information statement; prepared and revised an itemization of damages; conferred with M. Mitts re: trial preparation and strategy; reviewed the amended joint pretrial memorandum; revised the amended joint pretrial memorandum; reviewed each exhibit listed on defendants' exhibit list; reviewed case file.	10.40	2,860.00
EM	Trial preparation re: piercing the corporate veil.	3.70	1,017.50
KB	Redacted social security, EIN and bank financial information from trial exhibits; conference with J. Adams re: exhibits to be supplemented; revised index and updated trial exhibit binder.	3.50	332.50
01/07/2017			
MRM	Preparation for trial.	5.80	1,827.00
JA	Reviewed pleadings, discovery requests and responses; prepared timeline of all relevant events; reviewed defendants' opposition to plaintiff's motion in limine; reviewed defendants' motion in limine; conferred with M. Mitts and E. Millstein re: trial strategy; conducted legal research re: judicial admissions, the best evidence rule and ability to prove payment and precluding evidence not presented in response to discovery requests; prepared memorandum re: ability to preclude evidence not presented in discovery.	11.70	3,217.50
EM	Met with M. Mitts and J. Adams; trial preparation.	4.50	1,237.50
KB	Trial preparation (plaintiff's trial exhibits).	7.50	712.50
01/08/2017			
JA	Revised timeline of relevant events; prepared bench memorandum re: precluding evidence re: VPLLC's corporate records; trial preparation.	5.80	1,595.00
KB	Trial preparation (plaintiff's trial exhibits).	7.20	684.00
EM	Met with M. Mitts; trial preparation.	3.00	825.00
01/09/2017			
MRM	Final preparation before trial and trial before Judge Schiller.	10.30	3,244.50

Leonid Frenkel

February 07, 2017

Our File No: 1098-008M
Statement No: 16102

Klein

JA	Preparation for trial; attended trial.	9.80	2,695.00
KB	Uploaded plaintiff's combined version of trial exhibits to system; email to M. Mitts and J. Adams re: same; follow up re: possible use of blow up trial exhibits.	0.50	47.50
01/11/2017		0.40	126.00
		0.40	110.00
01/12/2017			
		2.70	742.50
01/13/2017		0.80	252.00
		0.80	220.00
01/16/2017			
MRM	Follow up on proposed findings of fact and conclusions of law.	0.30	94.50
MRM	Revisions to settlement agreement; follow up on briefing for proposed findings of fact and conclusions of law.	0.60	189.00
01/17/2017			
KB	Telephone calls to/from D. Hayes re: obtaining trial transcript; follow up with M. Mitts re: same.	0.20	19.00
01/18/2017			
MRM	Follow up on the settlement agreement; post-trial briefing and emails with J. Frankel.	0.40	126.00
KB	Telephone calls to/from D. Hayes re: cost of trial transcript; prepared letter to Laws Transcription Service with payment for trial transcript.	0.40	38.00
01/19/2017		0.40	110.00
01/25/2017			
		0.70	192.50
KB	Telephone call to/from D. Hayes re: audio CD of trial; prepared letter to D. Hayes with payment for audio CD; uploaded letter and payment to system.	0.70	66.50
01/27/2017		0.60	165.00
		0.40	110.00
01/31/2017			
JA	Listen to audio of trial.	0.40	110.00
	For Current Services Rendered	150.30	38,108.50

Leonid Frenkel

Our File No:

1098-008M

Statement No:

16102

Klein

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	28.30	\$315.00	\$8,914.50
Edward Millstein	29.20	275.00	8,030.00
Gerard McCabe	3.20	275.00	880.00
Michael Duffy	0.60	275.00	165.00
Kathleen Bennett	24.20	95.00	2,299.00
Jennifer Adams	64.80	275.00	17,820.00

Expenses

01/02/2017	12/19/16 - G. McCabe Parking Expense - Deadline for filing pretrial motions.	10.00
01/02/2017	Federal Express to Florida Department of State re: obtaining certified copy of Certificate of Status for Victory Partners, LLC.	23.03
01/07/2017	Federal Express Return from Florida Department of State, Certificate of Status for Victory Partners, LLC.	36.76
01/09/2017	Parking at U.S. District Court, trial.	14.00
	Total Expenses	83.79

Advances

01/06/2017	Hand Delivery to the Honorable Berle M. Schiller, Amended Joint Pretrial Stipulation, Plaintiff's Revised Exhibit List and Plaintiff's Revised Proposed Verdict Sheet.	6.75
01/18/2017	Transcription Fees - Laws Transcription Service, Trial Transcript.	1,275.00
01/19/2017	Hand Delivery to Laws Transcription Service, payment for Trial Transcript.	6.75
01/25/2017	Clerk, United States District Court, audio CD of bench trial before Judge Schiller on 1/9/17.	31.00
	Total Advances	1,319.50
	Total Current Work	39,511.79
	Previous Balance	\$140,778.79

Payments

	Total Payments for 02/07/2017	-1,200.00
	Balance Due	\$179,090.58

Client Funds

01/18/2017	Deposit to client funds	1,200.00
02/07/2017	Client Fund Payment (Trial Transcript)	-1,200.00
	Ending Client Funds Balance	\$0.00

Statements Printed:	1
Hours:	150.30
Fees:	38,108.50
Expenses:	83.79
Advances:	1,319.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

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March 15, 2017

Our File No:

1098-008M

Statement No:

16189

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Klein

Date	Initials	Description	Hours	Amount
02/06/2017	EM	Met with Mr. Mitts; listened to audio recording of trial transcript.	2.20	605.00
02/07/2017	EM	Listened to audio recording of trial transcript; reviewed trial transcript.	2.40	660.00
02/08/2017	EM	Listened to audio recording of trial transcript; reviewed trial transcript.	2.60	715.00
02/09/2017	MRM	Follow up on proposed findings of fact and conclusions of law; follow up on payment under the settlement agreement.	0.70	220.50
	EM	Reviewed trial transcript; prepared outline of proposed findings of facts.	1.90	522.50
02/10/2017				
	EM	Reviewed trial transcript; prepared outline of proposed findings of facts.	3.20 3.00	880.00 825.00
02/13/2017				
	EM	Reviewed trial transcript; prepared outline of proposed findings of facts.	0.60 3.20 2.50	189.00 880.00 687.50
02/14/2017				
	EM	Reviewed trial transcript; prepared outline of proposed findings of facts.	1.40 1.90 2.90	441.00 522.50 797.50
02/15/2017	EM	Prepared outline of proposed findings of facts; research re: conclusions of law.	2.60	715.00
			0.40	126.00
02/16/2017	EM	Prepared outline of proposed findings of fact and conclusions of law;		

March 15, 2017

Leonid Frenkel

Our File No:

1098-008M

Statement No:

16189

Klein

	conducted research re: conclusions of law.	2.50	687.50
02/17/2017			
EM	Prepared outline of proposed findings of fact and conclusions of law; conducted research re: conclusions of law; reviewed trial transcript.	3.20	880.00
02/23/2017			
EM	Conducted research re: proposed findings of fact and conclusions of law.	1.50	412.50
02/27/2017			
EM	Drafted proposed findings of fact and conclusions of law.	1.40	385.00
	For Current Services Rendered	40.10	11,151.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	3.10	\$315.00	\$976.50
Edward Millstein	28.70	275.00	7,892.50
Jennifer Adams	8.30	275.00	2,282.50

Advances

01/26/2017	Hand Delivery to the United States District Court, payment for audio Trial Transcript.	6.75
02/14/2017		6.75
02/15/2017		6.75
		20.25
	Total Advances	
	Total Current Work	11,171.75
	Previous Balance	\$179,090.58
	Balance Due	<u>\$190,262.33</u>

Statements Printed:	1
Hours:	40.10
Fees:	11,151.50
Advances:	20.25

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111

Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Page: 1
 April 12, 2017
 Our File No: 1098-008M
 Statement No: 16306

Klein

Date	Initials	Description	Hours	Amount
03/01/2017	EM	Prepared timeline re: Bruce Klein/Victory Partners' members and deals.	1.60	440.00
03/02/2017	JA	Continued drafting proposed findings of fact and conclusions of law.	4.80	1,320.00
03/03/2017	JA	Conducted legal research re: standard for piercing the corporate veil; reviewed Judge Schiller's Opinion; conducted legal research re: safe harbor provisions of Rule 144.	6.40	1,760.00
03/06/2017	JA	Conducted legal research re: attorney-client privilege between decedent's attorney and executrix; prepared memorandum detailing research; conferred with M. Mitts re: same; continued drafting proposed findings of fact and conclusions of law.	3.30	907.50
03/07/2017	JA	Drafted proposed findings of fact and conclusions of law.	7.40	2,035.00
	EM	Reviewed portions of transcript re: additions to findings of fact; conducted legal research re: conclusions of law.	3.10	852.50
03/08/2017	JA	Drafted Suggestion of Death; drafted letter to Judge Schiller requesting an extension of briefing deadline; conferred with M. Mitts re: same; revised letter to Judge Schiller, incorporating M. Mitts's comments.	1.70	467.50
	EM	Drafted, edited and revised findings of fact and conclusions of law.	3.70	1,017.50
03/09/2017	EM	Revised findings of fact and conclusions of law.	1.20	330.00
03/10/2017	EM	Revised findings of fact and conclusions of law.	2.10	577.50
03/14/2017	EM	Reviewed and revised findings of fact and conclusions of law.	2.00	550.00
03/15/2017	JA	Conferred with M. Mitts re: status of Letters Testamentary and substituting plaintiff.	0.20	55.00

April 12, 2017

1098-008M

16306

Leonid Frenkel

Our File No:

Statement No:

Klein

03/20/2017	EM	Drafted findings of fact and conclusions of law; reviewed transcript re: same.	3.50	962.50
03/21/2017	EM	Drafted findings of fact and conclusions of law; reviewed transcript re: same.	2.70	742.50
03/22/2017	JA	Drafted proposed Order, Order for hearing, motion for substitution and brief in support of motion for substitution.	2.60	715.00
03/23/2017	JA	Reviewed and revised motion for substitution package; drafted declaration; assembled exhibits.	1.60	440.00
	EM	Revised proposed findings of fact and conclusions of law.	1.30	357.50
03/24/2017	EM	Edited and revised findings of fact and conclusions of law.	1.50	412.50
03/27/2017	EM	Reviewed transcript re: additional evidence for findings of fact.	3.20	880.00
03/28/2017	GH	Reviewed and revised motion for substitution of party-plaintiff.	0.70	192.50
03/29/2017	JA	Revised Motion to substitute, incorporating G. Huling's comments.	0.50	137.50
	EM	Continued drafting findings of fact and conclusions of law.	3.70	1,017.50
03/30/2017	JA	Assembled motion to substitute package; emailed package to A. Pasternack for review.	0.10	27.50
	EM	Continued revising and drafting findings of fact and conclusion of law.	2.20	605.00
03/31/2017	JA	Follow-up with A. Pasternack re: motion to substitute.	0.20	55.00
		For Current Services Rendered	61.30	16,857.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Edward Millstein	31.80	\$275.00	\$8,745.00
Geoffrey Huling	0.70	275.00	192.50
Jennifer Adams	28.80	275.00	7,920.00

Total Current Work 16,857.50

Previous Balance \$190,262.33

Balance Due \$207,119.83

Statements Printed:	1
Hours:	61.30
Fees:	16,857.50

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Estate of Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Our File No:
 Statement No:

Page: 1
 May 10, 2017
 1098-008M
 16349

Klein

04/03/2017				
EM	Provided additional notes and edits to J. Adams; reviewed transcript for additional citations in findings of fact.	3.90	1,072.50	
JA	Finalized motion to substitute; follow-up email to A. Pasternack; correspondence with T. Millstein re: proposed findings of fact and conclusions of law.	0.60	165.00	
04/04/2017				
EM	Research re: failure of consideration; drafted additional paragraphs for findings of fact.	1.80	495.00	
JA	Reviewed T. Millstein's comments and suggestions to proposed findings of fact and conclusions of law; prepared motion for substitution for filing.	1.40	385.00	
04/07/2017				
		0.40	110.00	
04/12/2017				
EM	Reviewed transcript for additional citations for findings of fact.	1.10	302.50	
04/13/2017				
MRM	Follow up on proposed findings of fact and conclusions of law; follow up on motion to recover the cost of preparing the motion to enforce the settlement.	0.80	252.00	
EM	Reviewed transcript re: additional citations for findings of fact; meeting with J. Adams re: proposed findings of fact and conclusions of law; reviewed and analyzed edits and comments by J. Adams; added additional citations for findings of fact.	1.30	357.50	
JA	Meeting with T. Millstein re: proposed findings of fact and conclusions of law; reviewed and revised proposed findings of fact and conclusions of law.	2.90	797.50	
04/14/2017				
EM	Conducted additional research re: breach of contract; final review of transcript; revised and finalized findings of fact and conclusions of law.	1.20	330.00	
04/20/2017				
JA	Finalized proposed findings of fact and conclusions of law.	0.90	247.50	
04/21/2017				

n/c

Estate of Leonid Frenkel

Our File No:
Statement No:

Klein

04/23/2017	MRM	Revisions to the proposed findings of fact and conclusions of law.	1.30	409.50
04/24/2017	JA	Conferred with M. Mitts re: proposed findings; revised proposed findings; further revisions to proposed findings, incorporating G. Huling's comments; prepared exhibit Index.	3.80	1,045.00
	GH	Telephone conference with M. Mitts re: proposed findings of fact and conclusions of law; reviewed and revised proposed findings of fact and conclusions of law and conferred with J. Adams re: same (0.6 Hours).		n/c
04/25/2017	KB	Downloaded proposed findings of fact and conclusions of Law and exhibits; prepared binder with tabs of proposed findings of fact and conclusions of law and exhibits for Judge Schiller; prepared letter to Judge Schiller.	1.20	114.00
04/26/2017			1.30	409.50
			1.00	95.00
			3.20	880.00 n/c
04/27/2017			2.80	882.00
			0.30	28.50
			2.80	770.00
04/28/2017			0.50	137.50
			0.60	57.00
			35.10	9,342.50
	For Current Services Rendered			

Recapitulation

	Hours	Rate	Total
Timekeeper			
Maurice R. Mitts	6.20	\$315.00	\$1,953.00
Edward Millstein	9.30	275.00	2,557.50
Kathleen Bennett	3.10	95.00	294.50
Jennifer Adams	16.50	275.00	4,537.50

Estate of Leonid Frenkel

Our File No:

1098-008M

Statement No:

16349

Klein

Advances

04/25/2017	Hand-Delivery to the Honorable Berle M. Schiller, courtesy copy of Proposed Findings of Fact and Conclusions of Law.	6.75
05/01/2017		181.50
05/01/2017		31.00
05/01/2017		13.50
	Total Advances	232.75
	Total Current Work	9,575.25
	Previous Balance	\$207,119.83
	Balance Due	<u>\$216,695.08</u>

Statements Printed:	1
Hours:	35.10
Fees:	9,342.50
Advances:	232.75

MITTS LAW, LLC
 1822 Spruce Street
 Philadelphia, PA 19103
 Telephone: 215-866-0110
 Facsimile: 215-866-0111
 [REDACTED]

Page: 1
 June 02, 2017

Estate of Leonid Frenkel
 Triage Management, L.P.
 401 City Avenue
 Suite 528
 Bala Cynwyd PA 19004

Our File No: 1098-008M
 Statement No: 16397

Klein

05/01/2017	MRM	Follow up on the reply brief, brief in support of costs and counsel fees for the motion to enforce settlement and supplemental memorandum of law regarding false testimony by B. Klein on status of assets; meeting with J. Adams regarding same.	1.40	441.00
	JA	Review defendants' proposed findings of fact; conferred with M. Mitts re: response to defendants' proposed findings of fact; began drafting response to defendants' proposed findings of fact.	1.30	123.50
			3.50	962.50
05/02/2017	MRM	Follow up on supplemental submissions re: contempt and proposed findings of fact and conclusions of law.	0.70	220.50
	JA	Reviewed B. Klein's deposition transcript for use in supplemental submission; reviewed Matrimonial Settlement; drafted supplemental submission; began drafting Fee Petition.	0.80	220.00
			4.60	1,265.00
05/03/2017	JA	Drafted Fee Petition; drafted response to defendants' proposed findings of fact.	0.20	19.00
			5.60	1,540.00
05/04/2017	JA	Reviewed and revised Fee Petition, incorporating M. Mitts's comments; assembled exhibits and finalized Fee Petition for filing; reviewed and revised supplemental submission, incorporating M. Mitts's comments; assembled exhibits and finalized supplemental submission for filing; continued drafting response to defendants' proposed findings of fact; reviewed and revised response to defendants' proposed findings of fact, incorporating M. Mitts's comments.	1.00	95.00
			9.40	2,585.00

Estate of Leonid Frenkel

Our File No:
Statement No:

Klein

05/05/2017	JA	Reviewed defendants' response to proposed findings of fact and conclusions of law; prepared email to M. Mitts summarizing response.	1.20	330.00
05/08/2017			0.40	38.00
05/09/2017			0.20	19.00
			0.30	82.50
05/10/2017			0.40	38.00
05/11/2017			0.60	165.00
			2.50	687.50
05/12/2017			0.30	28.50
			1.70	467.50
05/14/2017			2.50	687.50
05/15/2017			2.80	770.00
			3.50	962.50
05/16/2017			0.40	126.00
			0.50	47.50
			0.30	82.50
05/18/2017				

Estate of Leonid Frenkel

Our File No:
Statement No:

Klein

B. Klein along with references to record designed to be used for argument and/or witness examination at May 31 hearing; circulated outline to M. Mitts, G. McCabe and J. Adams.

1.00 275.00

05/22/2017

55.00

05/23/2017

0.30 94.50

0.30 28.50

0.60 165.00

05/25/2017

1.10 302.50

05/26/2017

0.40 110.00

0.40 126.00

05/30/2017

0.30 94.50

0.20 55.00

05/31/2017

0.80 252.00

51.70 13,561.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Maurice R. Mitts	4.30	\$315.00	\$1,354.50
Michael Duffy	0.20	275.00	55.00
Kathleen Bennett	4.60	95.00	437.00
Geoffrey Huling	13.40	275.00	3,685.00
Jennifer Adams	29.20	275.00	8,030.00

Advances

05/08/2017

36.30

05/16/2017

194.00

05/16/2017

Estate of Leonid Frenkel

Our File No:

1098-008M

Statement No:

16397

Klein

hearing transcript.	6.75
Total Advances	237.05
Total Current Work	13,798.55
Previous Balance	\$216,695.08
<u>Payments</u>	
Total Payments for 06/02/2017	-43.65
Balance Due	<u>\$230,449.98</u>

Client Funds

05/26/2017	Refund from Lawrence Court Transcription - Transcript of 5/15/17 Hearing.	43.65
06/02/2017	Client Fund Payment	-43.65
	Ending Client Funds Balance	\$0.00

Statements Printed:	1
Hours:	51.70
Fees:	13,561.50
Advances:	237.05

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

ALLA PASTERNAK, EXECUTRIX OF THE
ESTATE OF LEON FRENKEL,

Plaintiff,

v.

BRUCE K. KLEIN, *et al.*,

Defendants.

:
: Civil Action
:
: No. 14-2275-BMS
:
:
:
:
:
:
:
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:

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5, Local Rule 5.1.2(8) and the General Order on Electronic Case Filing, I certify that, on August 7, 2017, a copy of the foregoing was filed, served and made available to all parties through counsel of record via this Court's ECF system.

Gary Samms, Esquire
Alex P. Basilevsky, Esquire
Obermayer Rebmann Maxwell & Hippel, LLP
1500 Market Street
Philadelphia, PA 19102

Attorneys for Defendants Bruce Klein and Victory Partners LLC

/s/ Jennifer M. Adams

Jennifer M. Adams